

Volume III:
Document Supplement, Part A
William J. Clinton Statements



REFERRAL

TO THE

UNITED STATES HOUSE OF REPRESENTATIVES

PURSUANT TO

TITLE 28, UNITED STATES CODE, § 595(C)

**DOCUMENT SUPPLEMENT
A**

SUBMITTED BY

THE OFFICE OF THE INDEPENDENT COUNSEL

SEPTEMBER 9, 1998

Table of Contents

595(c) REPORT

DOCUMENT SUPPLEMENT A - CLINTON STATEMENTS

INDEX

Tab	Description
1.	1/17/98 Deposition of President William Jefferson Clinton in the case of <i>Jones v. Clinton</i>
2.	1/17/98 Deposition Exhibit No. 1 - Definition of Sexual Relations
3.	1/17/98 Deposition Exhibit No. 2 - Definition of Sexual Assault and Offense of Sexual Assault
4.	1/17/98 Deposition Exhibit No. 3 - 18 USCS §2244 & §2245 - Sexual Abuse
5.	1/17/98 Deposition Exhibit No. 5 - Office of the Governor Sexual Harassment Policy
6.	1/17/98 Deposition Exhibit No. 6 - Third Annual Governor's Quality Conference Agenda, Wednesday, May 8, 1991
7.	1/17/98 Deposition Exhibit No. 7 - 4/1/91 Memo from Partain to Hernrich re: Governor's Role in Quality Conference
8.	1/17/98 Deposition Exhibit No. 8 - DF Call
9.	1/17/98 Deposition Exhibit No. 9 - President Clinton's Responses to Plaintiff's Third Set of Interrogatories
10.	1/17/98 Deposition Exhibit No. 10 - President Clinton's Responses to Plaintiff's First Set of Interrogatories
11.	1/17/98 Deposition Exhibit No. 11 - Handwritten Note from Gennifer to Bill
12.	1/17/98 Deposition Exhibit No. 12 - Handwritten Note from Gennifer to Bill Stamped Received on 2/25/91
13.	1/17/98 Deposition Exhibit No. 13 - Handwritten and Typed Note of President Clinton's encounter with Dolly Kyle at their Class Reunion
14.	1/17/98 Deposition Exhibit No. 14 - President Clinton's Supplemental Responses to Plaintiff's Second Set of Interrogatories
15.	1/17/98 Deposition Exhibit No. 15 - Affidavit of Jane Doe #6 signed by Monica S. Lewinsky on 1/7/98
16.	8/17/98 Grand Jury Testimony of President William Jefferson Clinton

Tab	Description
17.	8/17/98 Grand Jury Exhibit No. WJC-1 - Statement of President Clinton
18.	8/17/98 Grand Jury Exhibit No. WJC-2 - <i>Jones v. Clinton</i> Definition of Sexual Relations
19.	8/17/98 Grand Jury Exhibit No. WJC-3 - 1/17/98 Deposition of President William Jefferson Clinton in the case of <i>Jones v. Clinton</i>
20.	8/17/98 Grand Jury Exhibit No. WJC-4 - Affidavit of Jane Doe #6 signed by Monica S. Lewinsky on 1/7/98
21.	8/17/98 Grand Jury Exhibit No. WJC-5 - Photograph of President Clinton dated 8/6/98
22.	8/17/98 Grand Jury Exhibit No. WJC-6 - Photograph of the tie worn by President Clinton dated 8/6/98

Tab 1

**DEPOSITION OF
WILLIAM JEFFERSON CLINTON
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 2

Paula Jones v. William Jefferson Clinton and Danny Ferguson
No. LR-C-94-290 (E.D. Ark.)

DEPOSITION OF WILLIAM JEFFERSON CLINTON

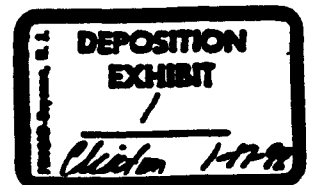
Definition of Sexual Relations

For the purposes of this deposition, a person engages in "sexual relations" when the person knowingly engages in or causes -

- (1) contact with the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to arouse or gratify the sexual desire of any person;
- (2) contact between any part of the person's body or an object and the genitals or anus of another person; or
- (3) contact between the genitals or anus of the person and any part of another person's body.

"Contact" means intentional touching, either directly or through clothing.

849-DC-00000586



Tab 3

Paula Jones v. William Jefferson Clinton and Danny Ferguson
No. LR-C-94-290 (E.D. Ark.)

DEPOSITION OF WILLIAM JEFFERSON CLINTON

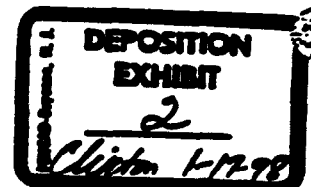
Definition of Sexual Assault and Offense of Sexual Assault

For the purposes of this deposition, a person commits a "sexual assault" and commits an "offense of sexual assault" when the person commits a crime under Federal law or the law of a State that involved -

- (1) any conduct proscribed by Section 2244(b) of title 18, United States Code;
- (2) contact, without consent, between any part of the defendant's body or an object and the genitals or anus of another person;
- (3) contact, without consent, between the genitals or anus of the defendant and any part of another person's body, or
- (4) an attempt or conspiracy to engage in conduct described in paragraphs (1) and (2).

"Contact" means intentional touching, either directly or through clothing.

849-DC-00060587



Tab 4

**DEPOSITION EXHIBIT 3
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 5

**DEPOSITION EXHIBIT 5
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 6

**Third Annual
Governor's Quality Conference**

**Excelsior Hotel
Little Rock, Arkansas**

Wednesday, May 8, 1991

AGENDA

- 7:30** **Registration**
- 8:00** **Welcome, Introduction**
Dave Harrington, *Executive Director, AIDC*
- Opening Remarks**
Bill Clinton, *Governor, State of Arkansas*

Tab 7

April 1, 1991

MEMORANDUM

TO: Nancy Hernrich
 FROM: Jan Partain JP
 RE: Governor's role in Quality Conference

The agenda for the Governor's Quality Conference on May 8 is enclosed, as well as the mail-outs we have done thus far.

We had planned for the Governor to kick off and to wrap up the conference; however, his presence for the entire day would be significant. The meeting is designed specifically for top managers, and they are requested not to send substitutes.

Please call me at 27327 if you have questions.

cc: Dave Harrington
 Jim Slakley

849-DC-00000593



Third Annual Governor's Quality Conference
Wednesday, May 8, 1991
Excelsior Hotel

8:00 Introductions
 Dave introduces Governor

 Governor talks about importance of Quality
 Management to manufacturers and thus to the
 state's economy, QM in state government,
 continued commitment to QM across the country,
 etc.

 Governor introduces speakers.

8:30 Lew Springer

10:00 Break

10:30 Lew Springer

12:00 Lunch

1:00 Jim Harrington

2:00 Break

2:30 Jim Harrington

3:30 Q & A

3:50 Wrap-up
 Governor wraps-up

4:00 Adjourn

849-DC-00000594

Tab 8

**DEPOSITION EXHIBIT 8
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 9

**PRESIDENT CLINTON'S RESPONSE
TO PLAINTIFF'S THIRD SET OF
INTERROGATORIES
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 10

**PRESIDENT CLINTON'S RESPONSES
TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 11

**DEPOSITION EXHIBIT 11
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 12

DEPOSITION EXHIBIT 12
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER

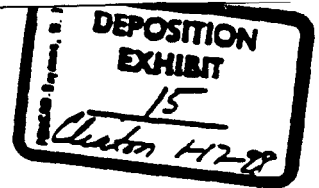
Tab 13

**DEPOSITION EXHIBIT 13
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 14

**PRESIDENT CLINTON'S
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S SECOND SET OF
INTERROGATORIES
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

Tab 15



AFFIDAVIT OF JANE DOE # 6

1. My name is Jane Doe #6. I am 24 years old and I currently reside at [REDACTED].

2. On December 19, 1997, I was served with a subpoena from the plaintiff to give a deposition and to produce documents in the lawsuit filed by Paula Corbin Jones against President William Jefferson Clinton and Danny Ferguson.

3. I can not fathom any reason that the plaintiff would seek information from me for her case.

4. I have never met Ms. Jones, nor do I have any information regarding the events she alleges occurred at the Excelsior Hotel on May 8, 1991 or any other information concerning any of the allegations in her case.

5. I worked at the White House in the summer of 1995 as a White House intern. Beginning in December, 1995, I worked in the Office of Legislative Affairs as a staff assistant for correspondence. In April, 1996, I accepted a job as assistant to the Assistant Secretary for Public Affairs at the U.S. Department of Defense. I maintained that job until December 26, 1997. I am currently unemployed but seeking a new job.

6. In the course of my employment at the White House I met President Clinton several times. I also saw the President at a number of social functions held at the White House. When I worked as an intern, he appeared at occasional functions attended by me and several other interns. The correspondence I drafted while I worked at the Office of Legislative Affairs was seen and edited by supervisors who either had the President's signature affixed by mechanism or, I believe, had the President sign the correspondence itself.

7. I have the utmost respect for the President who has always behaved appropriately in my presence.

8. I have never had a sexual relationship with the President, he did not propose that we have a sexual relationship, he did not offer me employment or other benefits in exchange for a sexual relationship, he did not deny me employment or other benefits for rejecting a sexual relationship. I do not know of any

other person who had a sexual relationship with the President, was offered employment or other benefits in exchange for a sexual relationship, or was denied employment or other benefits for rejecting a sexual relationship. The occasions that I saw the President after I left my employment at the White House in April, 1996, were official receptions, formal functions or events related to the U.S. Department of Defense, where I was working at the time. There were other people present on those occasions.

9. Since I do not possess any information that could possibly be relevant to the allegations made by Paula Jones or lead to admissible evidence in this case, I asked my attorney to provide this affidavit to plaintiff's counsel. Requiring my deposition in this matter would cause disruption to my life, especially since I am looking for employment, unwarranted attorney's fees and costs, and constitute an invasion of my right to privacy.

I declare under the penalty of perjury that the foregoing is true and correct.

Monica S. Lewinsky

MONICA S. LEWINSKY

849-DC-00000635

DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oath according to law, deposes and says that she has read the foregoing AFFIDAVIT OF JANE DOE # 6 by her subscribed, that the matters stated herein are true to the best of her information, knowledge and belief.

Monica S. Lewinsky
MONICA S. LEWINSKY

SUBSCRIBED AND SWORN to before me this 7th day of January, 1998.

Kathleen M. Grimes
NOTARY PUBLIC, D.C.
My Commission expires: August 31, 1998
~~My Commission Expires August 31, 1998~~

849-DC-00000636

Tab 16

OFFICE OF THE INDEPENDENT COUNSEL

-----X
 :
 TESTIMONY OF : Monday, August 17, 1998
 :
 WILLIAM JEFFERSON CLINTON : Washington, D. C.
 :
 -----X

Videotaped testimony of
 PRESIDENT WILLIAM JEFFERSON CLINTON
 before the Independent Counsel, held at The White House,
 Washington, D. C., beginning at 1:03 p.m., when were
 present on behalf of the respective parties:

FOR THE INDEPENDENT COUNSEL: KENNETH W. STARR, ESQ.
 Independent Counsel
 JACKIE M. BENNETT, JR., ESQ.
 ROBERT J. BITTMAN, ESQ.
 SOLOMON L. WISENBERG, ESQ.
 Deputy Independent Counsel
 MICHAEL W. EMMICK, ESQ.
 MARY ANNE WIRTH, ESQ.
 BERNARD JAMES APPERSON, ESQ.
 Associate Independent Counsel

FOR THE PRESIDENT: DAVID E. KENDALL, ESQ.
 NICOLE SELIGMAN, ESQ.
 Williams & Connolly
 CHARLES F. C. RUFF, ESQ.
 Counsel to the President

ALSO PRESENT: JAMES P. RICKARDS, JR.
 Senior Consultant, OIC
 GARY E. BRESNAHAN
 White House Technical Staff
 Secret Service Agent

Court Reporter: Elizabeth A. Eastman

Deposition Services, Inc.

be

2

P R O C E E D I N G S

MR. APPERSON: Mr. Wisenberg, the grand jury is in session. There is a quorum. There are no unauthorized persons in the grand jury room and they are prepared to receive the testimony of the President.

MR. WISENBERG: Thank you, Mr. Apperson. If we could proceed with the oath, please?

WHEREUPON,

WILLIAM JEFFERSON CLINTON

having been called for examination by the Independent Counsel, and having been first duly sworn, was examined and testified as follows:

EXAMINATION BY THE INDEPENDENT COUNSEL

BY MR. WISENBERG:

Q Good afternoon, Mr. President.

A Good afternoon.

Q Could you please state your full name for the record, sir?

A William Jefferson Clinton.

Q My name is Sol Wisenberg and I'm a Deputy Independent Counsel with the Office of Independent Counsel. With me today are some other attorneys from the Office of Independent Counsel.

At the courtroom are the ladies and gentlemen of the grand jury prepared to receive your testimony as you give

be

1 it. Do you understand, sir?

2 A Yes, I do.

3 Q This proceeding is subject to Rule 6(e) of the
4 Federal Rules of Criminal Procedure as modified by Judge
5 Johnson's order. You are appearing voluntarily today as a
6 part of an agreement worked out between your attorney, the
7 Office of the Independent Counsel, and with the approval of
8 Judge Johnson.

9 Is that correct, sir?

10 A That is correct.

11 MR. KENDALL: Mr. Wisenberg, excuse me. You
12 referred to Judge Johnson's order. I'm not familiar with
13 that order. Have we been served that, or not?

14 MR. WISENBERG: No. My understanding is that that
15 is an order that the Judge is going to sign today. She
16 didn't have the name of a WHCA person. And basically my
17 understanding is that it will cover all of the attorneys here
18 today and the technical people in the room, so that they will
19 be authorized persons permitted to hear grand jury testimony
20 that they otherwise wouldn't be authorize to hear.

21 MR. KENDALL: Thank you.

22 BY MR. WISENBERG:

23 Q The grand jury, Mr. President, has been empaneled
24 by the United States District Court for the District of
25 Columbia. Do you understand that, sir?

be

1 A I do.

2 Q And, among other things, is currently investigating
3 under the authority of the Court of Appeals upon application
4 by the Attorney General, whether Monica Lewinsky or others
5 obstructed justice, intimidated witnesses, or committed other
6 crimes related to the case of Jones v. Clinton.

7 Do you understand that, sir?

8 A I do.

9 Q And today, you will be receiving questions not only
10 from attorneys on the OIC staff, but from some of the grand
11 jurors, too. Do you understand that?

12 A Yes, sir, I do.

13 Q I'm going to talk briefly about your rights and
14 responsibilities as a grand jury witness. Normally, grand
15 jury witnesses, while not allowed to have attorneys in the
16 grand jury room with them, can stop and consult with their
17 attorneys. Under our arrangement today, your attorneys are
18 here and present for consultation and you can break to
19 consult with them as necessary, but it won't count against
20 our total time.

21 Do you understand that, sir?

22 A I do understand that.

23 Q You have a privilege against self-incrimination.
24 If a truthful answer to any question would tend to
25 incriminate you, you can invoke the privilege and that

be

1 invocation will not be used against you. Do you understand
2 that?

3 A I do.

4 Q And if you don't invoke it, however, any answer
5 that you do give can and will be used against you. Do you
6 understand that, sir?

7 A I do.

8 Q Mr. President, you understand that your testimony
9 here today is under oath?

10 A I do.

11 Q And do you understand that because you have sworn
12 to tell the truth, the whole truth, and nothing but the
13 truth, that if you were to lie or intentionally mislead the
14 grand jury, you could be prosecuted for perjury and/or
15 obstruction of justice?

16 A I believe that's correct.

17 Q Is there anything that you -- I've stated to you
18 regarding your rights and responsibilities that you would
19 like me to clarify or that you don't understand?

20 A No, sir.

21 Q Mr. President, I would like to read for you a
22 portion of Federal Rule of Evidence 603, which discusses the
23 important function the oath has in our judicial system.

24 It says that the purpose of the oath is one,
25 "calculated to awaken the witness' conscience and impress the

be

1 witness' mind with the duty" to tell the truth.

2 Could you please tell the grand jury what that oath
3 means to you for today's testimony?

4 A I have sworn an oath to tell the grand jury the
5 truth, and that's what I intend to do.

6 Q You understand that it requires you to give the
7 whole truth, that is, a complete answer to each question,
8 sir?

9 A I will answer each question as accurately and fully
10 as I can.

11 Q Now, you took the same oath to tell the truth, the
12 whole truth, and nothing but the truth on January 17th, 1998
13 in a deposition in the Paula Jones litigation; is that
14 correct, sir?

15 A I did take an oath then.

16 Q Did the oath you took on that occasion mean the
17 same to you then as it does today?

18 A I believed then that I had to answer the questions
19 truthfully, that is correct.

20 Q I'm sorry. I didn't hear you, sir.

21 A I believed that I had to answer the questions
22 truthfully. That's correct.

23 Q And it meant the same to you then as it does today?

24 A Well, no one read me a definition then and we
25 didn't go through this exercise then. I swore an oath to

298M

RECEIVED
U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535

be

1 tell the truth, and I believed I was bound to be truthful and
2 I tried to be.

3 Q At the Paula Jones deposition, you were represented
4 by Mr. Robert Bennett, your counsel, is that correct?

5 A That is correct.

6 Q He was authorized by you to be your representative
7 there, your attorney, is that correct?

8 A That is correct.

9 Q Your counsel, Mr. Bennett, indicated at page 5 of
10 the deposition, lines 10 through 12, and I'm quoting, "the
11 President intends to give full and complete answers as Ms.
12 Jones is entitled to have".

13 My question to you is, do you agree with your
14 counsel that a plaintiff in a sexual harassment case is, to
15 use his words, entitled to have the truth?

16 A I believe that I was bound to give truthful
17 answers, yes, sir.

18 Q But the question is, sir, do you agree with your
19 counsel that a plaintiff in a sexual harassment case is
20 entitled to have the truth?

21 A I believe when a witness is under oath in a civil
22 case, or otherwise under oath, the witness should do
23 everything possible to answer the questions truthfully.

24 MR. WISENBERG: I'm going to turn over questioning
25 now to Mr. Bittman of our office, Mr. President.

2/98M

P
D
A
G
N
E
C
O
C
B
B
A
Y
O
N
N
N
E
E
J
N
0
7
0
0
0
2
F
O
R
M
E
D

be

1 BY MR. BITTMAN:

2 Q Good afternoon, Mr. President.

3 A Good afternoon, Mr. Bittman.

4 Q My name is Robert Bittman. I'm an attorney with
5 the Office of Independent Counsel.

6 Mr. President, we are first going to turn to some
7 of the details of your relationship with Monica Lewinsky that
8 follow up on your deposition that you provided in the Paula
9 Jones case, as was referenced, on January 17th, 1998.

10 The questions are uncomfortable, and I apologize
11 for that in advance. I will try to be as brief and direct as
12 possible.

13 Mr. President, were you physically intimate with
14 Monica Lewinsky?

15 A Mr. Bittman, I think maybe I can save the -- you
16 and the grand jurors a lot of time if I read a statement,
17 which I think will make it clear what the nature of my
18 relationship with Ms. Lewinsky was and how it related to the
19 testimony I gave, what I was trying to do in that testimony.
20 And I think it will perhaps make it possible for you to ask
21 even more relevant questions from your point of view.

22 And, with your permission, I'd like to read that
23 statement.

24 Q Absolutely. Please, Mr. President.

25 A When I was alone with Ms. Lewinsky on certain

2/98M

P E N N S Y L V A N I A
C O U R T R E C O R D
B A Y O N N E
N J 0 7 0 0 2 F O R M
F E E D

be

1 occasions in early 1996 and once in early 1997, I engaged in
2 conduct that was wrong. These encounters did not consist of
3 sexual intercourse. They did not constitute sexual relations
4 as I understood that term to be defined at my January 17th,
5 1998 deposition. But they did involve inappropriate intimate
6 contact.

7 These inappropriate encounters ended, at my
8 insistence, in early 1997. I also had occasional telephone
9 conversations with Ms. Lewinsky that included inappropriate
10 sexual banter.

11 I regret that what began as a friendship came to
12 include this conduct, and I take full responsibility for my
13 actions.

14 While I will provide the grand jury whatever other
15 information I can, because of privacy considerations
16 affecting my family, myself, and others, and in an effort to
17 preserve the dignity of the office I hold, this is all I will
18 say about the specifics of these particular matters.

19 I will try to answer, to the best of my ability,
20 other questions including questions about my relationship
21 with Ms. Lewinsky; questions about my understanding of the
22 term "sexual relations", as I understood it to be defined at
23 my January 17th, 1998 deposition; and questions concerning
24 alleged subornation of perjury, obstruction of justice, and
25 intimidation of witnesses.

2/98M

P
R
O
C
E
E
D
I
N
G
B
A
Y
O
N
N
E
J
U
D
I
C
I
A
L
F
O
R
M

be

1 That, Mr. Bittman, is my statement.

2 Q Thank you, Mr. President. And, with that, we would
3 like to take a break.

4 A Would you like to have this?

5 Q Yes, please. As a matter of fact, why don't we
6 have that marked as Grand Jury Exhibit WJC-1.

7 (Grand Jury Exhibit WJC-1 was
8 marked for identification.)

9 THE WITNESS: So, are we going to take a break?

10 MR. KENDALL: Yes. We will take a break. Can we
11 have the camera off, now, please? And it's 1:14.

12 (Whereupon, the proceedings were recessed from 1:14 p.m.
13 until 1:30 p.m.)

14 MR. KENDALL: 1:30, Bob.

15 MR. BITTMAN: It's 1:30 and we have the feed with
16 the grand jury.

17 BY MR. BITTMAN:

18 Q Good afternoon again, Mr. President.

19 A Good afternoon, Mr. Bittman.

20 (Discussion off the record.)

21 BY MR. BITTMAN:

22 Q Mr. President, your statement indicates that your
23 contacts with Ms. Lewinsky did not involve any inappropriate,
24 intimate contact.

25 MR. KENDALL: Mr. Bittman, excuse me. The

be

11

1 witness --

2 THE WITNESS: No, sir. It indicates --

3 MR. KENDALL: The witness does not have --

4 THE WITNESS: -- that it did involve inappropriate
5 and intimate contact.

6 BY MR. BITTMAN:

7 Q Pardon me. That it did involve inappropriate,
8 intimate contact.

9 A Yes, sir, it did.

10 MR. KENDALL: Mr. Bittman, the witness -- the
11 witness does not have a copy of the statement. We just have
12 the one copy.

13 MR. BITTMAN: If he wishes --

14 MR. KENDALL: Thank you.

15 MR. BITTMAN: -- his statement back?

16 BY MR. BITTMAN:

17 Q Was this contact with Ms. Lewinsky, Mr. President,
18 did it involve any sexual contact in any way, shape, or form?

19 A Mr. Bittman, I said in this statement I would like
20 to stay to the terms of the statement. I think it's clear
21 what inappropriately intimate is. I have said what it did
22 not include. I -- it did not include sexual intercourse, and
23 I do not believe it included conduct which falls within the
24 definition I was given in the Jones deposition. And I would
25 like to stay with that characterization.

1 Q Let us then move to the definition that was
2 provided you during your deposition. We will have that
3 marked as Grand Jury Exhibit WJC-2.

4 (Grand Jury Exhibit WJC-2 was
5 marked for identification.)

6 BY MR. BITTMAN:

7 Q This is an exact copy, Mr. President, of the
8 exhibit that was provided you during that deposition. And
9 I'm sure you remember from the deposition that paragraph (1)
10 of the definition remained in effect. Judge Wright ruled
11 that that was to be the guiding definition, and that
12 paragraphs (2) and (3) were stricken.

13 Do you remember that, Mr. President?

14 A Yes. Specifically what I remember is there were
15 two different discussions, I think, of this. There was quite
16 an extended one in the beginning, and everybody was entering
17 into it. And in the end, the Judge said that she would take
18 the first definition and strike the rest of it. That's my
19 memory.

20 Q Did you -- well, at page 19 of your deposition in
21 that case, the attorney who provided you with the definition
22 asked you, "Would you please take whatever time you need to
23 read this definition". And later on in the deposition, you
24 did, of course, refer to the definition several times.

25 Were you, during the deposition, familiar with the

13

1 definition?

2 A Yes, sir. My -- let me just ask a question. If
3 you are going to ask me about my deposition, could I have a
4 copy of it? Does anybody have a copy of it?

5 Q Yes. We have a copy. We'll provide you with a
6 copy.

7 MS. WIRTH: We will mark it as Grand Jury Exhibit
8 WJC-3.

9 (Grand Jury Exhibit WJC-3 was
10 marked for identification.)

11 THE WITNESS: Now, did you say that was on page 19,
12 Mr. Bittman?

13 BY MR. BITTMAN:

14 Q It was at page 19, Mr. President, beginning at line
15 21, and I'll read it in full. This is from the Jones
16 attorney. "Would you please take whatever time you need to
17 read this definition, because when I use the term 'sexual
18 relations', this is what I mean today."

19 A All right. Yes, that starts on 19. But let me say
20 that there is a -- just for the record, my recollection was
21 accurate. There is a long discussion here between the
22 attorney and the Judge. It goes on until page 23. And in
23 the end the Judge says, "I'm talking only about part one in
24 the definition", and "Do you understand that"? And I answer,
25 "I do."

be

1 The judge says part one, and then the lawyer for
2 Ms. Jones says he's only talking about part one and asked me
3 if I understand it. And I say, I do, and that was my
4 understanding.

5 I might also note that when I was given this and
6 began to ask questions about it, I actually circled number
7 one. This is my circle here. I remember doing that so I
8 could focus only on those two lines, which is what I did.

9 Q Did you understand the words in the first portion
10 of the exhibit, Mr. President, that is, "For the purposes of
11 this deposition, a person engages in 'sexual relations' when
12 the person knowingly engages in or causes"?

13 Did you understand, do you understand the words
14 there in that phrase?

15 A Yes. My -- I can tell you what my understanding of
16 the definition is, if you want me to --

17 Q Sure.

18 A -- do it. My understanding of this definition is
19 it covers contact by the person being deposed with the
20 enumerated areas, if the contact is done with an intent to
21 arouse or gratify. That's my understanding of the
22 definition.

23 Q What did you believe the definition to include and
24 exclude? What kinds of activities?

25 A I thought the definition included any activity by

be

1 the person being deposed, where the person was the actor and
2 came in contact with those parts of the bodies with the
3 purpose or intent or gratification, and excluded any other
4 activity.

5 For example, kissing is not covered by that, I
6 don't think.

7 Q Did you understand the definition to be limited to
8 sexual activity?

9 A Yes, I understood the definition to be limited to,
10 to physical contact with those areas of the bodies with the
11 specific intent to arouse or gratify. That's what I
12 understood it to be.

13 Q What specific acts did the definition include, as
14 you understood the definition on January 17, 1998?

15 A Any contact with the areas there mentioned, sir.
16 If you contacted, if you contacted those parts of the body
17 with an intent to arouse or gratify, that is covered.

18 Q What did you understand --

19 A The person being deposed. If the person being
20 deposed contacted those parts of another person's body with
21 an intent to arouse or gratify, that was covered.

22 Q What did you understand the word "causes", in the
23 first phrase? That is, "For the purposes of this deposition,
24 a person engaged in 'sexual relations' when the person
25 knowingly" causes contact?

be

16

1 A I don't know what that means. It doesn't make any
2 sense to me in this context, because -- I think what I
3 thought there was, since this was some sort of -- as I
4 remember, they said in the previous discussion -- and I'm
5 only remembering now, so if I make a mistake you can correct
6 me. As I remember from the previous discussion, this was
7 some kind of definition that had something to do with sexual
8 harassment. So, that implies it's forcing to me, and I --
9 and there was never any issue of forcing in the case
10 involving, well, any of these questions they were asking me.

11 They made it clear in this discussion I just
12 reviewed that what they were referring to was intentional
13 sexual conduct, not some sort of forcible abusive behavior.

14 So, I basically -- I don't think I paid any
15 attention to it because it appeared to me that that was
16 something that had no reference to the facts that they
17 admitted they were asking me about.

18 Q So, if I can be clear, Mr. President, was it your
19 understanding back in January that the definition, now marked
20 as Grand Jury Exhibit 2, only included consensual sexual
21 activity?

22 A No. My understanding -- let me go back and say it.
23 My understanding -- I'll tell you what it did include. My
24 understanding was, what I was giving to you, was that what
25 was covered in those first two lines was any direct contact

2/98M

P
A
R
A
M
E
T
E
R
S
C
O
D
E
B
A
Y
O
N
N
E
J
0
7
0
0
0
2
F
O
R
M
E
D

be

17

1 by the person being deposed with those parts of another
2 person's body, if the contact was done with an intent to
3 arouse or gratify. That's what I believed it meant.

4 That's what I believed it meant then reading it.
5 That's what I believe it means today.

6 Q I'm just trying to understand, Mr. President. You
7 indicated that you put the definition in the context of a
8 sexual harassment case.

9 A No, no. I think it was not in the context of
10 sexual harassment. I just reread those four pages, which
11 obviously the grand jury doesn't have. But there was some
12 reference to the fact that this definition apparently bore
13 some, had some connection to some definition in another
14 context, and that this was being used not in that context,
15 not necessarily in the context of sexual harassment.

16 So, I would think that this "causes" would be,
17 would mean to force someone to do something. That's what I
18 read it. That's the only point I'm trying to make.

19 Therefore, I did not believe that anyone had ever
20 suggested that I had forced anyone to do anything, and that I
21 -- and I did not do that. And so that could not have had any
22 bearing on any questions related to Ms. Lewinsky.

23 Q I suppose, since you have now read portions of the
24 transcript again, that you were reminded that you did not ask
25 for any clarification of the terms. Is that correct? Of the

2/98M

P
E
R
J
U
R
O
R
E
C
O
R
D
S
O
F
F
I
C
I
A
L
P
R
O
C
E
E
D
I
N
G
S

be

18

1 definition?

2 A No, sir. I thought it was a rather -- when I read
3 it, I thought it was a rather strange definition. But it was
4 the one the Judge decided on and I was bound by it. So, I
5 took it.

6 Q During the deposition, you remember that Ms.
7 Lewinsky's name came up and you were asked several questions
8 about her. Do you remember that?

9 A Yes, sir, I do.

10 Q During those -- or before those questions actually
11 got started, your attorney, Mr. Bennett, objected to any
12 questions about Ms. Lewinsky, and he represented to Judge
13 Wright, who was presiding -- that was unusual, wasn't it,
14 that a federal judge would come and actually -- in your
15 experience -- that a federal judge would come and preside at
16 a deposition?

17 MR. KENDALL: Mr. Bittman, excuse me. Could you
18 identify the transcript page upon which Mr. Bennett objected
19 to all testimony about Ms. Lewinsky before it got started?

20 MR. BITTMAN: The objection, this quote that I'm
21 referring to, is going to begin at page 54 of the deposition.

22 MR. KENDALL: That is into the testimony though,
23 after the testimony about Ms. Lewinsky has begun, is it not?

24 BY MR. BITTMAN:

25 Q Mr. President, is it unusual for a federal judge to

2/98M

PENGAD CO BAYONNE NJ 07002 FORM FEE D

be

1 preside over a civil deposition?

2 A I think it is, but this was an unusual case. I
3 believe I know why she did it.

4 Q Your attorney, Mr. Bennett, objected to the
5 questions about Ms. Lewinsky, didn't he?

6 A What page is that on, sir?

7 Q Page 54, where he questions whether the attorneys
8 for Ms. Jones had a good faith basis to ask some of the
9 questions that they were posing to you. His objections
10 actually begin on page 53.

11 Since, as the President pointed out that the grand
12 jurors correctly do not have a copy of the deposition, I will
13 read the portion that I am referring to. And this begins at
14 line 1 on page 54.

15 "I question the good faith of counsel, the innuendo
16 in the question. Counsel is fully aware that Ms. Lewinsky
17 has filed, has an affidavit which they are in possession of
18 saying that there is absolutely no sex of any kind in any
19 manner, shape or form, with President Clinton".

20 A Where is that?

21 Q That is on page 54, Mr. President, beginning at
22 line 1, about midway through line 1.

23 A Well, actually, in the present tense that is an
24 accurate statement. That was an, that was an accurate
25 statement, if -- I don't -- I think what Mr. Bennett was.

be

20

1 concerned about, if I -- maybe it would be helpful to you and
2 to the grand jurors, quite apart from these comments, if I
3 could tell you what his state of mind was, what my state of
4 mind was, and why I think the Judge was there in the first
5 place.

6 If you don't want me to do it, I won't. But I
7 think it will help to explain a lot of this.

8 Q Well, we are interested, and I know from the
9 questions that we've received from the grand jurors they are
10 interested in knowing what was going on in your mind when you
11 were reading Grand Jury Exhibit 2, and what you understood
12 that definition to include.

13 Our question goes to whether -- and you were
14 familiar, and what Mr. Bennett was referring to obviously is
15 Ms. Lewinsky's affidavit. And we will have that marked, Mr.
16 President, as Grand Jury Exhibit WJC-4.

17 (Grand Jury Exhibit WJC-4 was
18 marked for identification.)

19 BY MR. BITTMAN:

20 Q And you remember that Ms. Lewinsky's affidavit said
21 that she had had no sexual relationship with you. Do you
22 remember that?

23 A I do.

24 Q And do you remember in the deposition that Mr.
25 Bennett asked you about that. This is at the end of the --

be

1 towards the end of the deposition. And you indicated, he
2 asked you whether the statement that Ms. Lewinsky made in her
3 affidavit was --

4 A Truthful.

5 Q -- true. And you indicated that it was absolutely
6 correct.

7 A I did. And at the time that she made the
8 statement, and indeed to the present day because, as far as I
9 know, she was never deposed since the Judge ruled she would
10 not be permitted to testify in a case the Judge ruled had no
11 merit; that is, this case we're talking about.

12 I believe at the time that she filled out this
13 affidavit, if she believed that the definition of sexual
14 relationship was two people having intercourse, then this is
15 accurate. And I believe that is the definition that most
16 ordinary Americans would give it.

17 If you said Jane and Harry have a sexual
18 relationship, and you're not talking about people being drawn
19 into a lawsuit and being given definitions, and then a great
20 effort to trick them in some way, but you are just talking
21 about people in ordinary conversations, I'll bet the grand
22 jurors, if they were talking about two people they know, and
23 said they have a sexual relationship, they meant they were
24 sleeping together; they meant they were having intercourse
25 together.

2/98M

P
R
I
N
T
E
D
C
O
B
A
Y
O
N
N
E
N
J
0
7
0
0
2
F
O
R
M
F
E
D

be

1 So, I'm not at all sure that this affidavit is not
2 true and was not true in Ms. Lewinsky's mind at the time she
3 swore it out.

4 Q Did you talk with Ms. Lewinsky about what she meant
5 to write in her affidavit?

6 A I didn't talk to her about her definition. I did
7 not know what was in this affidavit before it was filled out
8 specifically. I did not know what words were used
9 specifically before it was filled out, or what meaning she
10 gave to them.

11 But I'm just telling you that it's certainly true
12 what she says here, that we didn't have -- there was no
13 employment, no benefit in exchange, there was nothing having
14 anything to do with sexual harassment. And if she defined
15 sexual relationship in the way I think most Americans do,
16 meaning intercourse, then she told the truth.

17 Q My question --

18 A And that depends on what was in her mind. I don't
19 know what was in her mind. You'll have to ask her that.

20 Q But you indicated before that you were aware of
21 what she intended by the term "sexual relationship".

22 A No, sir. I said I thought that this could be a
23 truthful affidavit. And when I read it, since that's the way
24 I would define it, since -- keep in mind, she was not, she
25 was not bound by this sexual relations definition, which is

2/98M

P E N N S Y L V A N I A
C O U R T S
B A Y O N N E
J U D I C I A L
F O R M

be

1 highly unusual; I think anybody would admit that. When she
2 used a different term, sexual relationship, if she meant by
3 that what most people mean by it, then that is not an
4 untruthful statement.

5 Q So, your definition of sexual relationship is
6 intercourse only, is that correct?

7 A No, not necessarily intercourse only. But it would
8 include intercourse. I believe, I believe that the common
9 understanding of the term, if you say two people are having a
10 sexual relationship, most people believe that includes
11 intercourse. So, if that's what Ms. Lewinsky thought, then
12 this is a truthful affidavit. I don't know what was in her
13 mind. But if that's what she thought, the affidavit is true.

14 Q What else would sexual relationship include besides
15 intercourse?

16 A Well, that -- I think -- let me answer what I said
17 before. I think most people when they use that term include
18 sexual relationships and whatever other sexual contact is
19 involved in a particular relationship. But they think it
20 includes intercourse as well. And I would have thought so.
21 Before I got into this case and heard all I've heard, and
22 seen all I've seen, I would have thought that that's what
23 nearly everybody thought it meant.

24 Q Well, I ask, Mr. President, because your attorney,
25 using the very document, Grand Jury Exhibit 4, WJC-4,

2/98M

P E N N S Y L V A N I A
C O U R T R E C O R D S
N J 0 7 0 0 2 F O R M F E E D

be

1 represented to Judge Wright that his understanding of the
2 meaning of that affidavit, which you've indicated you thought
3 Ms. Lewinsky thought was, she was referring just to
4 intercourse, he says to Judge Wright that it meant absolutely
5 no sex of any kind in any manner, shape or form.

6 A Well, let me say this. I didn't have any
7 discussion obviously at this moment with Mr. Bennett. I'm
8 not even sure I paid much attention to what he was saying. I
9 was thinking, I was ready to get on with my testimony here
10 and they were having these constant discussions all through
11 the deposition. But that statement in the present tense, at
12 least, is not inaccurate, if that's what Mr. Bennett meant.
13 That is, at the time that he said that, and for some time
14 before, that would be a completely accurate statement.

15 Now, I don't believe that he was -- I don't know
16 what he meant. You'd have to talk to him, because I just
17 wasn't involved in this, and I didn't pay much attention to
18 what was being said. I was just waiting for them to get back
19 to me. So, I can't comment on, or be held responsible for,
20 whatever he said about that, I don't think.

21 Q Well, if you -- do you agree with me that if he
22 mislead Judge Wright in some way that you would have
23 corrected the record and said, excuse me, Mr. Bennett, I
24 think the Judge is getting a misimpression by what you're
saying?

be

25

1 A Mr. Bennett was representing me. I wasn't
2 representing him. And I wasn't even paying much attention to
3 this conversation, which is why, when you started asking me
4 about this, I asked to see the deposition. I was focusing on
5 my answers to the questions. And I've told you what I
6 believe about this deposition, which I believe to be true.

7 And it's obvious, and I think by your questions you
8 have betrayed that the Jones lawyers' strategy in this case
9 had nothing to do with uncovering or proving sexual
10 harassment.

11 By the time this discovery started, they knew they
12 had a bad case on the law and they knew what our evidence
13 was. They knew they had a lousy case on the facts. And so
14 their strategy, since they were being funded by my political
15 opponents, was to have this dragnet of discovery. They
16 wanted to cover everybody. And they convinced the Judge,
17 because she gave them strict orders not to leak, that they
18 should be treated like other plaintiffs in other civil cases,
19 and how could they ever know whether there had been any
20 sexual harassment, unless they first knew whether there had
21 been any sex.

22 And so, with that broad mandate limited by time and
23 employment in the federal or state government, they proceeded
24 to cross the country and try to turn up whatever they could;
25 not because they thought it would help their case. By the

2/98M

P
A
R
I
S
C
O
B
A
Y
O
N
N
E
J
O
U
R
N
A
L
O
F
L
I
B
E
R
T
I
E
S

be

26

1 time they did this discovery, they knew what this deal was in
2 their case, and they knew what was going to happen. And
3 Judge Wright subsequently threw it out. What they --

4 Q With all respect, Mister --

5 A Now, let me finish, Mr. Bennett [sic]. I mean, you
6 brought this up. Excuse me, Mr. Bittman.

7 What they wanted to do, and what they did do, and
8 what they had done by the time I showed up here, was to find
9 any negative information they could on me, whether it was
10 true or not; get it in a deposition; and then leak it, even
11 though it was illegal to do so. It happened repeatedly. The
12 Judge gave them orders.

13 One of the reasons she was sitting in that
14 deposition was because she was trying to make sure that it
15 didn't get out of hand.

16 But that was their strategy, and they did a good
17 job of it, and they got away with it. I've been subject to
18 quite a lot of illegal leaking, and they had a very
19 determined deliberate strategy, because their real goal was
20 to hurt me. When they knew they couldn't win the lawsuit,
21 they thought, well, maybe we can pummel him. Maybe they
22 thought I'd settle. Maybe they just thought they would get
23 some political advantage out of it. But that's what was
24 going on here.

25 Now, I'm trying to be honest with you, and it hurts

2/98M

P E N N S Y L V A N I A C O U R T R E C O R D S

27

8 Because by then, by this time, this thing had been
9 going on a long time. They knew what our evidence was. They
10 knew what the law was in the circuit in which we were
11 bringing this case. And so they just thought they would take
12 a wrecking ball to me and see if they could do some damage.

16 A She certainly did. And they asked them and I did
17 my best to answer them. I'm just trying to tell --

19 A -- you what my state of mind was.

22 A It was.

24 A But it was not my responsibility, in the face of
25 their repeated illegal leaking, it was not my responsibility

be

1 to volunteer a lot of information. There are many cases in
2 this deposition where I gave -- and keep in mind, I prepared,
3 I treated them, frankly, with respect. I prepared very well
4 for this deposition on the Jones matters. I prepared very
5 well on that. I did not know that Linda Tripp had been
6 involved in the preparation of this deposition, or that all
7 of you --

8 Q Do you know that now?

9 A No, I don't. I just know that -- what I read in
10 the papers about it. But I had no way of knowing that they
11 would ask me all these detailed questions. I did the best I
12 could to answer them.

13 Q Did you prepare --

14 A But in this deposition, Mr. Bittman, I was doing my
15 best to be truthful. I was not trying to be particularly
16 helpful to them, and I didn't think I had an obligation to be
17 particularly helpful to them to further a -- when I knew that
18 there was no evidence here of sexual harassment, and I knew
19 what they wanted to do was to leak this, even though it was
20 unlawful to do so. That's --

21 Q Did you believe, Mr. President --

22 A -- what I knew.

23 Q -- that you had an obligation to make sure that the
24 presiding federal judge was on board and had the correct
25 facts? Did you believe that was your obligation?

2/98M

P
R
O
C
E
S
S
I
N
G
C
O
U
N
T
I
N
G
F
O
R
M
A
T
I
O
N

1 A Sir, I was trying to answer my testimony. I was
2 thinking about my testimony. I don't believe I ever even
3 focused on what Mr. Bennett said in the exact words he did
4 until I started reading this transcript carefully for this
5 hearing. That moment, that whole argument just passed me by.
6 I was a witness. I was trying to focus on what I said and
7 how I said it.

8 And, believe me, I knew what the purpose of the
9 deposition was. And, sure enough, by the way, it did all
10 leak, just like I knew it would.

11 Q Let me ask you, Mr. President, you indicate in your
12 statement that you were alone with Ms. Lewinsky. Is that
13 right?

14 A Yes, sir.

15 Q How many times were you alone with Ms. Lewinsky?

16 A Let me begin with the correct answer. I don't know
17 for sure. But if you would like me to give an educated
18 guess, I will do that, but I do not know for sure. And I
19 will tell you what I think, based on what I remember. But I
20 can't be held to a specific time, because I don't have
21 records of all of it.

22 Q How many times do you think?

23 A Well, there are two different periods here.
24 There's the period when she worked in the White House until
25 April of '96. And then there's the period when she came back

1 to visit me from February '97 until late December '97.

2 Based on our records -- let's start with the
3 records, where we have the best records and the closest in
4 time. Based on our records, between February and December,
5 it appears to me that at least I could have seen her
6 approximately nine times. Although I do not believe I saw
7 her quite that many times, at least it could have happened.

8 There were -- we think there were nine or 10 times
9 when she was in, in the White House when I was in the Oval
10 Office when I could have seen her. I do not believe I saw
11 her that many times, but I could have.

12 Now, we have no records for the time when she was
13 an employee at the White House, because we have no records of
14 that for any of the employees at the White House, unless
15 there was some formally scheduled meeting that was on the, on
16 the calendar for the day.

17 I remember -- I'll tell you what I remember. I
18 remember meeting her, or having my first real conversation
19 with her during the government shutdown in November of '95,
20 when she -- as I explained in my deposition, during the
21 government shutdown, the -- most federal employees were
22 actually prohibited from coming to work, even in the White
23 House. Most people in the White House couldn't come to work.
24 The Chief of Staff could come to work. My National Security
25 Advisor could come to work. I could.

1 Therefore, interns were assigned to all offices.
2 And I believe it was her last week as an intern. Anyway, she
3 worked in the Chief of Staff's Office. One night she brought
4 me some pizza. We had some remarks.

5 Now, the next time I remember seeing her alone was
6 on a couple of occasions when she was working in the
7 Legislative Affairs Office as a full-time employee. I
8 remember specifically, I have a specific recollection of two
9 times. I don't remember when they were, but I remember twice
10 when, on Sunday afternoon, she brought papers down to me,
11 stayed, and we were alone.

12 And I am frankly quite sure -- although I have no
13 specific memory, I am quite sure there were a couple of more
14 times, probably two times more, three times more. That's
15 what I would say. That's what I can remember. But I do not
16 remember when they were, or at what time of day they were, or
17 what the facts were. But I have a general memory that would
18 say I certainly saw her more than twice during that period
19 between January and April of 1996, when she worked there.

20 Q So, if I could summarize your testimony,
21 approximately five times you saw her before she left the
22 White House, and approximately nine times after she left the
23 employment of the White House?

24 A I know there were several times in '97. I've told
25 you that I've looked at my calendar and I tell you what I.

be

-32

1 think the outer limits are. I would think that would sound
2 about right. There could be, in that first four-month
3 period, there, maybe there's one or two more, maybe there's
4 one less. I just don't know. I don't remember. I didn't
5 keep records.

6 But I'm giving you what I specifically remember and
7 then what I generally remember. I'm doing the best to be
8 helpful to you.

9 Q Have you reviewed the records for December 28th,
10 1997, Mr. President?

11 A Yes, sir, I have.

12 Q Do you believe that Ms. Lewinsky was at the White
13 House and saw you on December 28th, 1997?

14 A Yes, sir, I do.

15 Q And do you remember talking with Ms. Lewinsky about
16 her subpoena that she received for the Paula Jones case on
17 that day?

18 A I remember talking with Ms. Lewinsky about her
19 testimony, or about the prospect that she might have to give
20 testimony. And she, she talked to me about that. I remember
21 that.

22 Q And you also gave her Christmas gifts, is that not
23 correct, Mr. President?

24 A That is correct. They were Christmas gifts and
25 they were going-away gifts. She was moving to New York to,

2/98M

P
B
A
K
O
N
N
E
J
0
7
0
0
2
F
O
R
M
F
E
D

33

3 Q And you actually requested this meeting, is that
4 not correct?

14 I don't remember who requested the meeting though.

15 I'm sorry, I don't.

18 A Yes, sir.

20 A I was.

24 A Well, that was just, that was just something I had
25 in the place to, to contain the gifts. But I believe that

1 the gifts I gave her were -- I put them in that bag. That's
2 what I had there, and I knew she liked things from The Black
3 Dog. So, I gave her -- I think that's what I put the
4 presents in.

5 I remember what the presents were. I don't
6 remember what the bag was I gave them in.

7 Q Did you also give her a marble bear's head carving
8 from Vancouver, Canada?

9 A I did do that. I remember that.

10 Q And you also gave her a Rockettes blanket; that is,
11 the famous Rockettes from New York?

12 A I did do that. I had that, I had had that in my
13 possession for a couple of years but had never used it, and
14 she was going to New York. So, I thought it would be a nice
15 thing to give her.

16 Q You gave her a box of cherry chocolates, is that
17 right?

18 A I don't remember that, sir. I mean, there could
19 have been. I, I just don't remember. I remember giving the
20 bear and the throw. I don't remember what else. And it
21 seems to me like there was one other thing in that bag. I
22 didn't remember the cherry chocolates.

23 Q How about a pin of the New York skyline? Did you
24 give --

25 A That --

be

1 Q -- her that?

2 A That could have been in there. I seem to remember
3 I gave her some kind of pin.

4 Q What about a pair of joke sunglasses?

5 A I don't remember that. I'm not denying it. I just
6 -- I'm telling you what I remember and what I don't.

7 Q You had given Ms. Lewinsky gifts on other occasions
8 though, is that right, Mr. President?

9 A Yes, I had.

10 Q This, though, was -- you gave her the most gifts
11 that you had ever given her in a single day, is that right?

12 A Well, that's probably true. It was sort of like a
13 going-away present and a Christmas present as well. And she
14 had given me a particularly nice book for Christmas, an
15 antique book on Presidents. She knew that I collected old
16 books and it was a very nice thing. And I just thought I
17 ought to get up a few things and give them to her before she
18 left.

19 Q You mentioned that you discussed her subpoena in
20 the Paula Jones case. Tell us specifically, what did you
21 discuss?

22 A No, sir, that's not what I said. I said, my
23 recollection is I knew by then, of course, that she had
24 gotten a subpoena. And I knew that she was, therefore, was
25 slated to testify. And she mentioned to me -- and I believe

2/98M
P E E N G A D C O B A Y O N N E N J 0 7 0 0 2 F O R M F E E D

- 36

4 She mentioned to me that she did not want to
5 testify. So, that's how it came up. Not in the context of,
6 I heard you have a subpoena, let's talk about it.

14 O So --

19 Q And you didn't want her to testify, did you? You
20 didn't want her to disclose these embarrassing facts of this
21 inappropriate intimate relationship that you had, is that
22 correct?

23 A Well, I did not want her to have to testify and go
24 through that. And, of course, I didn't want her to do that,
25 of course not.

be

37

1 Q Did you want those facts, not only the fact that
2 she would testify, but did you want the facts that she had
3 about your embarrassing inappropriate intimate relationship
4 to be disclosed?

5 A Not there, but not in any context. However, I, I
6 never had any high confidence that they wouldn't be.

7 Q Did anyone, as far as you knew, know about your
8 embarrassing inappropriate intimate relationship that you had
9 with Ms. Lewinsky?

10 A At that time, I was unaware that she had told
11 anyone else about it. But if, if I had known that, it would
12 not have surprised me.

13 Q Had you told anyone?

14 A Absolutely not.

15 Q Had you tried, in fact, not to let anyone else know
16 about this relationship?

17 A Well, of course.

18 Q What did you do?

19 A Well, I never said anything about it, for one
20 thing. And I did what people do when they do the wrong
21 thing. I tried to do it where nobody else was looking at it.

22 Q How many times did you do that?

23 A Well, if you go back to my statement, I remember
24 there were a few times in '96, I can't say with any
25 certainty. There was once in early '97. After she left the

2/98M

P E E G A D C O B A Y O N Z E N J 0 7 0 0 2 F O R M F E D

be

38

1 White House, I do not believe I ever had any inappropriate
2 contact with her in the rest of '96. There was one occasion
3 in '97 when, regrettably, that we were together for a few
4 minutes, I think about 20 minutes, and there was
5 inappropriate contact. And after that, to the best of my
6 memory and belief, it did not occur again.

7 Q Did you tell her in the conversation about her
8 being subpoenaed -- she was upset about it, you acknowledge
9 that?

10 A (Witness nodded indicating an affirmative
11 response.)

12 Q I'm sorry, you have to respond for the record. Yes
13 or no? Do you agree that she was upset about being
14 subpoenaed?

15 A Oh, yes, sir, she was upset. She -- well, she --
16 we -- she didn't -- we didn't talk about a subpoena. But she
17 was upset. She said, I don't want to testify; I know nothing
18 about this; I certainly know nothing about sexual harassment;
19 why do they want me to testify. And I explained to her why
20 they were doing this, and why all these women were on these
21 lists, people that they knew good and well had nothing to do
22 with any sexual harassment.

23 I explained to her that it was a political lawsuit.
24 They wanted to get whatever they could under oath that was
25 damaging to me, and then they wanted to leak it in violation

be

39

1 of the Judge's orders, and turn up their nose and say, well,
2 you can't prove we did it. Now, that was their strategy.
3 And that they were very frustrated because everything they
4 leaked so far was old news. So, they desperately were trying
5 to validate this massive amount of money they'd spent by
6 finding some new news. And --

7 Q You were familiar --

8 A -- she didn't want to be caught up in that, and I
9 didn't blame her.

10 Q You were familiar, weren't you, Mr. President, that
11 she had received a subpoena. You've already acknowledged
12 that.

13 A Yes, sir, I was.

14 Q And Mr. Jordan informed you of that, is that right?

15 A No, sir. I believe -- and I believe I testified to
16 this in my deposition. I think the first person who told me
17 that she had been subpoenaed was Bruce Lindsey. I think the
18 first -- and I was -- in this deposition, it's a little bit
19 cloudy, but I was trying to remember who the first person who
20 told me was, because the question was, again as I remember it
21 -- could we go to that in the deposition, since you asked me
22 that?

23 Q Actually, I think you're -- with all respect, I
24 think you may be confusing when Mr. Lindsey -- well, perhaps
25 Mr. Lindsey did tell you she was subpoenaed, I don't know.

be

40

1 But in your deposition, you were referring to Mr. Lindsey
2 notifying you that she had been identified as a witness.

3 A Where is that, sir? I don't want to get -- I just
4 want -- what page is that?

5 Q Well, actually --

6 A No, it had to be, because I saw a witness list much
7 earlier than that.

8 Q Much earlier than December 28?

9 A Oh, sure. And it had been earlier than -- she
10 would -- I believe Monica --

11 MR. KENDALL: Page 69.

12 THE WITNESS: I believe Monica Lewinsky's name was
13 on a witness list earlier than she was subpoenaed.

14 BY MR. BITTMAN:

15 Q Yes.

16 A So, I believe when I was answering this question,
17 at least I thought I was answering when I found out -- yes.
18 See, there's -- on page 68, "Did anyone other than your
19 attorneys ever tell you that Monica Lewinsky had been served
20 with a subpoena in this case?" Then I said, "I don't think
21 so." Then I [sic] said, "Did you ever talk" to Monica "about
22 the possibility that she might be asked to testify in this
23 case?"

24 Then I gave an answer that was nonresponsive, that
25 really tried to finish the answer above. I said, "Bruce

41

1 Lindsey, I think Bruce Lindsey told me that she was, I think
2 maybe that's the first person told me she was. I want to be
3 as accurate as I can."

4 And that -- I believe that Bruce is the first
5 person who told me that Monica had gotten a subpoena.

6 Q Did you, in fact, have a conversation with Mr.
7 Jordan on the evening of December 19, 1997, in which he
8 talked to you about Monica being in Mr. Jordan's office,
9 having a copy of the subpoena, and being upset about being
10 subpoenaed?

11 A I remembered that Mr. Jordan was in the White House
12 on December 19th and for an event of some kind. That he came
13 up to the Residence floor and told me that he had, that
14 Monica had gotten a subpoena and, or that Monica was going to
15 have to testify. And I think he told me he recommended a
16 lawyer for her. I believe that's what happened. But it was
17 a very brief conversation. He was there for some other
18 reason.

19 Q And if Mr. Jordan testified that he had also spoken
20 to you at around 5 p.m., and the White House phone logs
21 reflect this, that he called you at around the time he met
22 with Ms. Lewinsky and informed you then that she had been
23 subpoenaed, is that consistent with your memory? Also on the
24 19th?

25 A I had a lot of phone conversations with Vernon

be

42

1 about this. I didn't keep records of them. I now have some
2 records. My memory is not clear and my testimony on that was
3 not clear. I just knew that I talked to Vernon at some time,
4 but I thought that Bruce was the first person who told me.

5 Q But Mr. Jordan had also told you, is that right?

6 A Yes. I now know I had a conversation with Mr.
7 Jordan about it where he said something to me about that.

8 Q And that was probably on the 19th, December 19th?

9 A Well, I know I saw him on the 19th. So, I'm quite
10 sure. And if he says he talked to me on the 19th, I believe
11 he would have better records and I certainly think he's a
12 truthful person.

13 Q Getting back to your meeting with Ms. Lewinsky on
14 December 28, you are aware that she's been subpoenaed. You
15 are aware, are you not, Mr. President, that the subpoena
16 called for the production of, among other things, all the
17 gifts that you had given Ms. Lewinsky? You were aware of
18 that on December 28th, weren't you?

19 A I'm not sure. And I understand this is an
20 important question. I did have a conversation with Ms.
21 Lewinsky at some time about gifts, the gifts I'd given her.
22 I do not know whether it occurred on the 28th, or whether it
23 occurred earlier. I do not know whether it occurred in
24 person or whether it occurred on the telephone. I have
25 searched my memory for this, because I know it's an important

be

43

1 issue.

2 Perhaps if you -- I can tell you what I remember
3 about the conversation and you can see why I'm having trouble
4 placing the date.

5 Q Please.

6 A The reason I'm not sure it happened on the 28th is
7 that my recollection is that Ms. Lewinsky said something to
8 me like, what if they ask me about the gifts you've given me.
9 That's the memory I have. That's why I question whether it
10 happened on the 28th, because she had a subpoena with her,
11 request for production.

12 And I told her that if they asked her for gifts,
13 she'd have to give them whatever she had, that that's what
14 the law was.

15 And let me also tell you, Mr. Bittman, if you go
16 back and look at my testimony here, I actually asked the
17 Jones lawyers for help on one occasion, when they were asking
18 me what gifts I had given her, so they could -- I was never
19 hung up about this gift issue. Maybe it's because I have a
20 different experience. But, you know, the President gets
21 hundreds of gifts a year, maybe more. I have always given a
22 lot of gifts to people, especially if they give me gifts.
23 And this was no big deal to me. I mean, it's nice. I enjoy
24 it. I gave dozens of personal gifts to people last
25 Christmas. I give gifts to people all the time. Friends of

be

1 mine give me gifts all the time, give me ties, give me books,
2 give me other things. So, it was just not a big deal.

3 And I told Ms. Lewinsky that, just -- I said, you
4 know, if they ask you for this, you'll have to give them
5 whatever you have. And I think, Mr. Bittman, it must have
6 happened before then, because -- either that, or Ms. Lewinsky
7 didn't want to tell me that she had the subpoena, because
8 that was the language I remember her using.

9 Q Well, didn't she tell you, Mr. President, that the
10 subpoena specifically called for a hat pin that you had
11 produced, pardon me, that you had given her?

12 A I don't remember that. I remember -- sir, I've
13 told you what I remember. That doesn't mean that my memory
14 is accurate. A lot of things have happened in the last
15 several months, and a lot of things were happening then. But
16 my memory is she asked me a general question about gifts.
17 And my memory is she asked me in the hypothetical. So, it's
18 possible that I had a conversation with her before she got a
19 subpoena. Or it's possible she didn't want to tell me that
20 was part of the subpoena. I don't know.

21 But she may have been worried about this gift
22 business. But it didn't bother me. My experience was
23 totally different. I told her, I said, look, the way these
24 things work is, when a person get a subpoena, you have to
25 give them whatever you have; that's what's the rule, that's

be

45

1 what the law is.

2 And when I was asked about this in my deposition,
3 even though I was not trying to be helpful particularly to
4 these people that I thought were not well-motivated, or being
5 honest or even lawful in their conduct vis-a-vis me, that is,
6 the Jones legal team, I did ask them specifically to
7 enumerate the gifts. I asked them to help me because I
8 couldn't remember the specifics.

9 So, all I'm saying is, it didn't -- I wasn't
10 troubled by this gift issue.

11 Q And your testimony is that Ms. Lewinsky was
12 concerned about her turning over any gifts that you had given
13 her, and that your recommendation to her was, absolutely,
14 Monica, you have to produce everything that I have given you.
15 Is that your testimony?

16 A My testimony is what I have said, and let me
17 reiterate it. I don't want to agree to a characterization of
18 it. I want to just say what it was.

19 My testimony is that my memory is that on some day
20 in December, and I'm sorry I don't remember when it was, she
21 said, well, what if they ask me about the gifts you have
22 given me. And I said, well, if you get a request to produce
23 those, you have to give them whatever you have.

24 And it just, to me, it -- I don't -- I didn't then,
25 I don't now see this as a problem. And if she thought it was

be

46

1 a problem, I think it -- it must have been from a, really, a
2 misapprehension of the circumstances. I certainly never
3 encouraged her not to, to comply lawfully with a subpoena.

4 Q Mr. President, if your intent was, as you have
5 earlier testified, that you didn't want anybody to know about
6 this relationship you had with Ms. Lewinsky, why would you
7 feel comfortable giving her gifts in the middle of discovery
8 in the Paula Jones case?

9 A Well, sir, for one thing, there was no existing
10 improper relationship at that time. I had, for nearly a
11 year, done my best to be a friend to Ms. Lewinsky, to be a
12 counselor to her, to give her good advice, and to help her.
13 She had, for her part, most of the time, accepted the changed
14 circumstances. She talked to me a lot about her life, her
15 job ambitions, and she continued to give me gifts. And I
16 felt that it was a right thing to do to give her gifts back.

17 I have always given a lot of people gifts. I have
18 always been given gifts. I do not think there is anything
19 improper about a man giving a woman a gift, or a woman giving
20 a man a gift, that necessarily connotes an improper
21 relationship. So, it didn't bother me.

22 I wasn't -- you know, this was December 28th. I
23 was -- I gave her some gifts. I wasn't worried about it. I
24 thought it was an all right thing to do.

25 Q What about notes and letters, cards, letters and

2/98M

P E N G A D C O B A Y O N N E N J 0 7 0 0 0 2 F O R M F E D

be

47

1 notes to Ms. Lewinsky? After this relationship, this
2 inappropriate intimate relationship between you and Ms.
3 Lewinsky ended, she continued to send you numerous intimate
4 notes and cards, is that right?

5 A Well, they were -- some of them were, were somewhat
6 intimate. I'd say most of them, most of the notes and cards
7 were, were affectionate all right, but, but she had clearly
8 accepted the fact that there could be no contact between us
9 that was in any way inappropriate.

10 Now, she, she sent cards sometimes that were just
11 funny, even a little bit off-color, but they were funny. She
12 liked to send me cards, and I got a lot of those cards;
13 several, anyway, I don't know a lot. I got a few.

14 Q She professed her love to you in these cards after
15 the end of the relationship, didn't she?

16 A Well, --

17 Q She said she loved you?

18 A Sir, the truth is that most of the time, even when
19 she was expressing her feelings for me in affectionate terms,
20 I believed that she had accepted, understood my decision to
21 stop this inappropriate contact. She knew from the very
22 beginning of our relationship that I was apprehensive about
23 it. And I think that in a way she felt a little freer to be
24 affectionate, because she knew that nothing else was going to
25 happen. I can't explain entirely what was in her mind.

be

48

1 But most of these messages were not what you would
2 call over the top. They weren't things that, if you read
3 them, you would say, oh, my goodness, these people are having
4 some sort of sexual affair.

5 Q Mr. President, the question --

6 A But some of them were quite affectionate.

7 Q My question was, did she or did she not profess her
8 love to you in those cards and letters that she sent to you
9 after the relationship ended?

10 A Most of them were signed, "Love", you know, "Love,
11 Monica." I don't know that I would consider -- I don't
12 believe that in most of these cards and letters she professed
13 her love, but she might well have. I -- but, you know, love
14 can mean different things, too, Mr. Bittman. I have -- there
15 are a lot of women with whom I have never had any
16 inappropriate conduct who are friends of mine, who will say
17 from time to time, I love you. And I know that they don't
18 mean anything wrong by that.

19 Q Specifically, Mr. President, do you remember a card
20 she sent you after she saw the movie Titanic, in which she
21 said that she reminisced or dreamed about the romantic
22 feelings that occurred in the movie, and how that reminded
23 her of you two? Do you remember that?

24 A No, sir, but she could have sent it. I -- just
25 because I don't remember it doesn't mean it wasn't there.

2/98M
P
B
A
G
A
D
O
C
O
B
A
Y
O
O
N
N
E
N
J
O
7
0
0
2
F
O
R
M
E
R
D
E

49

23 Q She certainly sent you something like that after
24 the relationship began, didn't she? And so, therefore, there
25 was, at the time she sent it, something inappropriate going

be

1 on?

2 A Well, my recollection is that she -- that maybe
3 because of changed circumstances in her own life in 1997,
4 after there was no more inappropriate contact, that she sent
5 me more things in the mail, and that there was sort of a
6 disconnect sometimes between what she was saying and the
7 plain facts of our relationship. And I don't know what
8 caused that. But it may have been dissatisfaction with the
9 rest of her life. I don't know.

10 You know, she had, from the time I first met her,
11 talked to me about the rest of her personal life, and it may
12 be that there was some reason for that. It may be that when
13 I did the right thing and made it stick, that in a way she
14 felt a need to cling more closely, or try to get closer to
15 me, even though she knew nothing improper was happening or
16 was going to happen. I don't know the answer to that.

17 Q After you gave her the gifts on December 28th, did
18 you speak with your secretary, Ms. Currie, and ask her to
19 pick up a box of gifts that were some compilation of gifts
20 that Ms. Lewinsky would have --

21 A No, sir, I didn't do that.

22 Q -- to give to Ms. Currie?

23 A I did not do that.

24 Q When you testified in the Paula Jones case, this
25 was only two and a half weeks after you had given her these

2/98M

AMERICAN BAR ASSOCIATION
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

51

1 six gifts, you were asked, at page 75 in your deposition,
2 lines 2 through 5, "Well, have you ever given any gifts to
3 Monica Lewinsky?" And you answer, "I don't recall."

4 And you were correct. You pointed out that you
5 actually asked them, for prompting, "Do you know what they
6 were?"

7 A I think what I meant there was I don't recall what
8 they were, not that I don't recall whether I had given them.
9 And then if you see, they did give me these specifics, and I
10 gave them quite a good explanation here. I remembered very
11 clearly what the facts were about The Black Dog. And I said
12 that I could have given her a hat pin and a Walt Whitman
13 book; that I did not remember giving her a gold broach, which
14 was true. I didn't remember it. I may have given it to her,
15 but I didn't remember giving her one.

16 They didn't ask me about the, about the Christmas
17 gifts, and I don't know why I didn't think to say anything
18 about them. But I have to tell you again, I even invited
19 them to have a list.

20 It was obvious to me by this point in the
21 definition, in this deposition, that they had, these people
22 had access to a lot of information from somewhere, and I
23 presume it came from Linda Tripp. And I had no interest in
24 not answering their questions about these gifts. I do not
25 believe that gifts are incriminating, nor do I think they are

be

1 wrong. I think it was a good thing to do. I'm not, I'm
2 still not sorry I gave Monica Lewinsky gifts.

3 Q Why did you assume that that information came from
4 Linda Tripp?

5 A I didn't then.

6 Q Well, you didn't? I thought you just testified you
7 did then?

8 A No, no, no. I said I now assume that because --

9 Q You now assume.

10 A -- of all of the subsequent events. I didn't know.
11 I just knew that --

12 Q Let me ask you about --

13 A -- that somebody had access to some information and
14 they may have known more about this than I did.

15 Q Let me ask you about the meeting you had with Betty
16 Currie at the White House on Sunday, January 18 of this year,
17 the day after your deposition. First of all, you didn't --
18 Mrs. Currie, your secretary of six-some years, you never
19 allowed her, did you, to watch whatever intimate activity you
20 did with Ms. Lewinsky, did you?

21 A No, sir, not to my knowledge.

22 Q And as far as you know, she couldn't hear anything
23 either, is that right?

24 A There were a couple of times when Monica was there
25 when I asked Betty to be places where she could hear, because

2/98M

AMERICAN BAR ASSOCIATION
FEDERAL RULES OF EVIDENCE

be

1 Monica was upset and I -- this was after there was -- all the
2 inappropriate contact had been terminated.

3 Q No, I'm talking --

4 A But --

5 Q -- about the times that you actually had the
6 intimate contact.

7 A She was -- I believe that -- well, first of all, on
8 that one occasion in 1997, I do not know whether Betty was in
9 the White House after the radio address in the Oval Office
10 complex. I believe she probably was, but I'm not sure. But
11 I'm certain that someone was there. I always -- always
12 someone was there.

13 In 1996, I think most of the times that Ms.
14 Lewinsky was there, there may not have been anybody around
15 except maybe coming in and out, but not permanently so. I --
16 that's correct. I never -- I didn't try to involve Betty in
17 that in any way.

18 Q Well, not only did you not try to involve her, you
19 specifically tried to exclude her and everyone else, isn't
20 that right?

21 A Well, yes. I've never -- I mean, it's almost
22 humorous, sir. I'd, I'd, I'd have to be an exhibitionist not
23 to have tried to exclude everyone else.

24 Q So, if Ms. Currie testified that you approached her
25 on the 18th, or you spoke with her and you said, you were

2/98M

P
A
R
T
I
C
I
P
A
N
T
S
O
F
T
W
A
R
E
C
O
M
P
A
N
Y
O
F
A
M
E
R
I
C
A
N
A
N
D
F
O
R
E
I
G
N
C
O
R
P
O
R
A
T
I
O
N
S

be

1 always there when she was there, she wasn't, was she? That
2 is, Mrs. Currie?

3 A She was always there in the White House, and I was
4 concerned -- let me back up and say --

5 Q What about the radio address, Mr. President?

6 A Let me back up a second, Mr. Bittman. I knew about
7 the radio address. I was sick after it was over and I, I was
8 pleased at that time that it had been nearly a year since any
9 inappropriate contact had occurred with Ms. Lewinsky. I
10 promised myself it wasn't going to happen again. The facts
11 are complicated about what did happen and how it happened.
12 But, nonetheless, I'm responsible for it. On that night, she
13 didn't.

14 I was more concerned about the times after that
15 when Ms. Lewinsky was upset, and I wanted to establish at
16 least that I had not -- because these questions were -- some
17 of them were off the wall. Some of them were way out of
18 line, I thought.

19 And what I wanted to establish was that Betty was
20 there at all other times in the complex, and I wanted to know
21 what Betty's memory was about what she heard, what she could
22 hear. And what I did not know was -- I did not know that.
23 And I was trying to figure out, and I was trying to figure
24 out in a hurry because I knew something was up.

25 Q So, you wanted --

2/98M

AMERICAN BAR ASSOCIATION
FEDERAL COURTS AND JUDICIAL SYSTEM
JULY 1998 EDITION
FORM 4-98

2 Q -- to check her memory for what she remembered, and
3 that is --

5 Q -- whether she remembered nothing, or whether she
6 remembered an inappropriate intimate --

8 Q -- relationship?

15 And then I asked her specifically about a couple of
16 times when -- once when I asked her to remain in the dining
17 room, Betty, while I met with Monica in my study. And once
18 when I took Monica in the, the small office Nancy Hernreich
19 occupies right next to Betty's and talked to her there for a
20 few minutes. That's my recollection of that.

21 I was trying to -- I knew, Mr. Bittman, to a
22 reasonable certainty that I was going to be asked more
23 questions about this. I didn't really expect you to be in
24 the Jones case at the time. I thought what would happen is
25 that it would break in the press, and I was trying to get the

be

1 facts down. I was trying to understand what the facts were.

2 Q If Ms. Currie testified that these were not really
3 questions to her, that they were more like statements, is
4 that not true?

5 A Well, I can't testify as to what her perception
6 was. I can tell you this. I was trying to get information
7 in a hurry. I was downloading what I remembered. I think
8 Ms. Currie would also testify that I explicitly told her,
9 once I realized that you were involved in the Jones case --
10 you, the Office of Independent Counsel -- and that she might
11 have to be called as a witness, that she should just go in
12 there and tell the truth, tell what she knew, and be
13 perfectly truthful.

14 So, I was not trying to get Betty Currie to say
15 something that was untruthful. I was trying to get as much
16 information as quickly as I could.

17 Q What information were you trying to get from her
18 when you said, I was never alone with her, right?

19 A I don't remember exactly what I did say with her.
20 That's what you say I said.

21 Q If Ms. Currie testified to that, if she says you
22 told her, I was never alone with her, right?

23 A Well, I was never alone with her --

24 Q Did you not say that, Mr. President?

25 A Mr. Bittman, just a minute. I was never alone with

2/98M

RECEIVED
JAN 20 1998
FBI
WASHINGTON
D.C.

be

1 her, right, might be a question. And what I might have meant
2 by that is, in the Oval Office complex.

3 Could --

4 Q Well, you knew the answer to that, didn't you?

5 A We've been going for more than an hour. Would you
6 mind if we took a break? I need to go to the restroom.

7 MR. BITTMAN: Let's take a break.

8 MR. KENDALL: It's 2:38.

9 (Whereupon, the proceedings were recessed from 2:38 p.m.
10 until 2:48 p.m.)

11 MR. KENDALL: It is 2:38 -- sorry, 2:48.

12 BY MR. WISENBERG:

13 Q Mr. President, I want to, before I go into a new
14 subject area, briefly go over something you were talking
15 about with Mr. Bittman.

16 The statement of your attorney, Mr. Bennett, at the
17 Paula Jones deposition, "Counsel is fully aware" -- it's page
18 54, line 5 -- "Counsel is fully aware that Ms. Lewinsky has
19 filed, has an affidavit which they are in possession of
20 saying that there is absolutely no sex of any kind in any
21 manner, shape or form, with President Clinton".

22 That statement is made by your attorney in front of
23 Judge Susan Webber Wright, correct?

24 A That's correct.

25 Q That statement is a completely false statement.

2/98M

AMERICAN OVERSIGHT

58

5 A It depends on what the meaning of the word "is" is.
6 If the -- if he -- if "is" means is and never has been, that
7 is not -- that is one thing. If it means there is none, that
8 was a completely true statement.

14 And if you go back and look at the sequence of
15 this, you will see that the Jones lawyers decided that this
16 was going to be the Lewinsky deposition, not the Jones
17 deposition. And, given the facts of their case, I can
18 understand why they made that decision. But that is not how
19 I prepared for it. That is not how I was thinking about it.

20 And I am not sure, Mr. Wisenberg, as I sit here
21 today, that I sat there and followed all these interchanges
22 between the lawyers. I'm quite sure that I didn't follow all
23 the interchanges between the lawyers all that carefully. And
24 I don't really believe, therefore, that I can say Mr.
25 Bennett's testimony or statement is testimony and is

be

1 imputable to me. I didn't -- I don't know that I was even
2 paying that much attention to it.

3 Q You told us you were very well prepared for the
4 deposition.

5 A No. I said I was very well prepared to talk about
6 Paula Jones and to talk about Kathleen Willey, because she
7 had made a related charge. She was the only person that I
8 think I was asked about who had anything to do with anything
9 that would remotely approximate sexual harassment. The rest
10 of this looked to me like it was more of a way to harass me.

11 Q You are the President of the United States and your
12 attorney tells a United States District Court Judge that
13 there is no sex of any kind, in any way, shape or form,
14 whatsoever. And you feel no obligation to do anything about
15 that at that deposition, Mr. President?

16 A I have told you, Mr. Wisenberg, I will tell you for
17 a third time. I am not even sure that when Mr. Bennett made
18 that statement that I was concentrating on the exact words he
19 used.

20 Now, if someone had asked me on that day, are you
21 having any kind of sexual relations with Ms. Lewinsky, that
22 is, asked me a question in the present tense, I would have
23 said no. And it would have been completely true.

24 Q Was Mr. Bennett aware of this tense-based
25 distinction you are making now --

2/98M

P
A
R
A
M
E
T
E
R
S
O
F
T
W
A
R
E
F
O
R
M
E
D

be

1 A I don't --

2 MR. KENDALL: I'm going to object to any questions
3 about communications with private counsel.

4 MR. WISENBERG: Well, the witness has already
5 testified, I think, that Mr. Bennett didn't know about the
6 inappropriate relationship with Ms. Lewinsky. I guess --

7 THE WITNESS: Well, you'll have to ask him that,
8 you know. He was not a sworn witness and I was not paying
9 that close attention to what he was saying. I've told you
10 that repeatedly. I was -- I don't -- I never even focused on
11 that until I read it in this transcript in preparation for
12 this testimony.

13 When I was in there, I didn't think about my
14 lawyers. I was, frankly, thinking about myself and my
15 testimony and trying to answer the questions.

16 BY MR. WISENBERG:

17 Q I just want to make sure I understand, Mr.
18 President. Do you mean today that because you were not
19 engaging in sexual activity with Ms. Lewinsky during the
20 deposition that the statement of Mr. Bennett might be
21 literally true?

22 A No, sir. I mean that at the time of the
23 deposition, it had been -- that was well beyond any point of
24 improper contact between me and Ms. Lewinsky. So that anyone
25 generally speaking in the present tense, saying there is not

2/98M

P E N N S Y L V A N I A
C O U R T O F A P P E A L S
J U D I C I A L B R A N C H
F O R M J E T

be

61

1 an improper relationship, would be telling the truth if that
2 person said there was not, in the present tense; the present
3 tense encompassing many months. That's what I meant by that.

4 Not that I was -- I wasn't trying to give you a
5 cute answer, that I was obviously not involved in anything
6 improper during a deposition. I was trying to tell you that
7 generally speaking in the present tense, if someone said
8 that, that would be true. But I don't know what Mr. Bennett
9 had in his mind. I don't know. I didn't pay any attention
10 to this colloquy that went on. I was waiting for my
11 instructions as a witness to go forward. I was worried about
12 my own testimony.

13 Q I want to go back to some questions about Mr.
14 Jordan and we are going to touch a little bit on the December
15 19th meeting and some others. Mr. Jordan is a long-time
16 friend of yours, is that correct, Mr. President?

17 A Yes, sir. We've been friends probably 20 years,
18 maybe more.

19 Q You said you consider him to be a truthful person,
20 correct?

21 A I do.

22 Q If Mr. Jordan has told us that he visited you in
23 the Residence on the night of the 19th, after a White House
24 holiday dinner, to discuss Monica Lewinsky and her subpoena
25 with you, do you have any reason to doubt it?

2/98M

A
B
C
D
E
F
G
H
I
J
K
L
M
N
O
P
Q
R
S
T
U
V
W
X
Y
Z

be

1 A No. I've never known him to say anything that
2 wasn't true. And his memory of these events, I think, would
3 be better than mine because I had a lot of other things going
4 on.

5 Q We have WAVE records that will show that, but in
6 the interest of time I'm not going to -- since you don't
7 dispute that, I'm not going to show them right now.

8 And, in fact, that was the very day Monica Lewinsky
9 was subpoenaed, wasn't it, the night that he came to see you?

10 A I don't have an independent memory of that, but you
11 would probably know that. I mean, I'm sure there is a record
12 of when she got her subpoena.

13 Q If Mr. Jordan has told us that he spoke with you
14 over the phone within about an hour of Monica receiving her
15 subpoena, and later visited you that very day, the night at
16 the White House, to discuss it, again you'd have no reason to
17 doubt him, is that correct?

18 A I've already -- I believe I've already testified
19 about that here today, that I had lots of conversations with
20 Vernon. I'm sure that I had lots of conversations with him
21 that included comments about this. And if he has a specific
22 memory of when I had some conversation on a certain day, I
23 would be inclined to trust his memory over mine, because
24 under the present circumstances my head's probably more
25 cluttered than his, and my schedule is probably busier. He's

2/98M

P
R
O
C
E
E
D
I
N
G
R
E
C
O
R
D
I
N
G
F
O
R
M
E
R

be

1 probably got better records.

2 Q And when Mr. Jordan met with you at the Residence
3 that night, sir, he asked you if you'd been involved in a
4 sexual relationship with Monica Lewinsky, didn't he?

5 A I do not remember exactly what the nature of the
6 conversation was. I do remember that I told him that there
7 was no sexual relationship between me and Monica Lewinsky,
8 which was true. And that -- then all I remember for the rest
9 is that he said he had referred her to a lawyer, and I
10 believe it was Mr. Carter, and I don't believe I've ever met
11 Mr. Carter. I don't think I know him.

12 Q Mr. President, if Mr. Jordan has told us that he
13 had a very disturbing conversation with Ms. Lewinsky that
14 day, then went over to visit you at the White House, and that
15 before he asked you the question about a sexual relationship,
16 related that disturbing conversation to you, the conversation
17 being that Ms. Lewinsky had a fixation on you and thought
18 that perhaps the First Lady would leave you at the end of --
19 that you would leave the First Lady at the end of your term
20 and come be with Ms. Lewinsky, do you have any reason to
21 doubt him that it was on that night that that conversation
22 happened?

23 A All I can tell you, sir, is I, I certainly don't
24 remember him saying that. Now, he could have said that
25 because, as you know, a great many things happened in the

2/98M

P E
R M
I T
T E
D
C O
P Y
I N
G
O
N
L Y
O
F
O
R
M
F
E
E

64

3 Q At any time?

8 Q In fact, she was very distraught about the
9 subpoena, according to Mr. Jordan, wasn't she?

14 Q That is something that one would be likely to
15 remember, don't you think, Mr. President?

21 Q Do you recall him at all telling you that he was
22 concerned about her fascination with you, even if you don't
23 remember the specific conversation about you leaving the
24 First Lady?

25 A I recall him saying he thought that she was upset

be

1 with -- somewhat fixated on me, that she acknowledged that
2 she was not having a sexual relationship with me, and that
3 she did not want to be drug into the Jones lawsuit. That's
4 what I recall. And I recall his getting, saying that he had
5 recommended a lawyer to her and she had gone to see the
6 lawyer. That's what I recall.

7 I don't remember the other thing you mentioned. I
8 just -- I might well remember it if he had said it. Maybe he
9 said it and I've forgotten it, but I don't -- I can't tell
10 you that I remember that.

11 Q Mr. President, you swore under oath in the Jones
12 case that you didn't think anyone other than your lawyers had
13 ever told you that Monica Lewinsky had been subpoenaed. Page
14 68, line 22 [sic] through page 69, line 3. Here's the
15 testimony, sir.

16 Question -- we've gone over it a little bit before:
17 "Did anyone other than your attorneys ever tell you that
18 Monica Lewinsky had been served with a subpoena in this
19 case?" Answer, "I don't think so."

20 Now, this deposition was taken just three and a
21 half weeks after, by your own testimony, Vernon Jordan made a
22 trip at night to the White House to tell you, among other
23 things, that Monica Lewinsky had been subpoenaed and was
24 upset about it. Why did you give that testimony under oath
25 in the Jones case, sir?

2/98M

RECEIVED
JAN 10 1998
FBI

be

66

1 A Well, Mr. Wisenberg, I think you have to -- again,
2 you have to put this in the context of the flow of questions,
3 and I've already testified to this once today. I will
4 testify to it again.

5 My answer to the next question, I think, is a way
6 of finishing my answer to the question and the answer you've
7 said here. I was trying to remember who the first person,
8 other than Mr. Bennett -- I don't think Mr. Bennett -- who
9 the first person told me that, who told me Paula Jones had, I
10 mean, excuse me, Monica Lewinsky had a subpoena. And I
11 thought that Bruce Lindsey was the first person. And that's
12 how I was trying to remember that.

13 Keep in mind, sort of like today, these questions
14 are being kind of put at me rapid-fire. But, unlike today, I
15 hadn't had the opportunity to prepare at this level of
16 detail. I didn't -- I was trying to keep a lot of things in
17 my head that I had remembered with regard to the Paula Jones
18 case and the Kathleen Willey matter, because I knew I would
19 be asked about them. And I gave the best answers I could.
20 Several of my answers are somewhat jumbled.

21 But this is an honest attempt here -- if you read
22 both these answers, it's obvious they were both answers to
23 that question you quoted, to remember the first person, who
24 was not Mr. Bennett, who told me. And I don't believe Vernon
25 was the first person who told me. I believe Bruce Lindsey

2/98M

P E N N S Y L V A N I A
C O U R T
O F
J U D I C I A L
B R A N C H E S
F O R M
F E E D

be

1 was.

2 Q Let me read the question, because I want to talk
3 about the first person issue. The question on line 25 of
4 page 68 is, "Did anyone other than your attorneys ever tell
5 you that Monica Lewinsky had been served with a subpoena in
6 this case?" Answer, "I don't think so."

7 You would agree with me, sir, that the question
8 doesn't say, the question doesn't say anything about who was
9 the first person. It just says, did anyone tell you. Isn't
10 that correct?

11 A That's right. And I said Bruce Lindsey, because I
12 was trying to struggle with who -- where I had heard this.
13 And they were free to ask a follow-up question, and they
14 didn't.

15 Q Mr. President, three and a half weeks before, Mr.
16 Jordan had made a special trip to the White House to tell you
17 Ms. Lewinsky had been subpoenaed; she was distraught; she had
18 a fixation over you. And you couldn't remember that, three
19 and a half weeks later?

20 A Mr. Wisenberg, if -- they had access to all this
21 information from their conversations with Linda Tripp, if
22 that was the basis of it. They were free to ask me more
23 questions. They may have been trying to trick me.

24 Now, they knew more about the details of my
25 relationship with Monica Lewinsky. I'm not sure everything

2/98M

P E E
R S O N A L
C O N F I D E N T I A L
B A Y O N N E
N J 0 7 0 0 2
F O R M
F E E D

be

1 they knew was true, because I don't know. I've not heard
2 these tapes or anything. But they knew a lot more than I
3 did. And instead of trying to trick me, what they should
4 have done is to ask me specific questions, and I invited them
5 on more than one occasion to ask follow-up questions.

6 This is the third or fourth time that you seem to
7 be complaining that I did not do all their work for them.
8 That just sitting here answering these questions to the best
9 of my memory, with limited preparation, was not enough. That
10 I should have actually been doing all their work for them.

11 Now, they'd been up all night with Linda Tripp, who
12 had betrayed her friend, Monica Lewinsky, stabbed her in the
13 back and given them all this information. They could have
14 helped more. If they wanted to ask me follow-up questions,
15 they could. They didn't. I'm sorry. I did the best I
16 could.

17 Q Can you tell the grand jury what is tricky about
18 the question, "Did anyone other than your attorneys ever tell
19 you" --

20 A No, there's nothing -- I'm just telling -- I have
21 explained. I will now explain for the third time, sir. I
22 was being asked a number of questions here. I was struggling
23 to remember then. There were lots of things that had gone on
24 during this time period that had nothing to do with Monica
25 Lewinsky.

be

69

1 You know, I believed then, I believe now that
2 Monica Lewinsky could have sworn out an honest affidavit,
3 that under reasonable circumstances, and without the benefit
4 of what Linda Tripp did to her, would have given her a chance
5 not to be a witness in this case.

6 So, I didn't have perfect memory of all these
7 events that have now, in the last seven months, since Ms.
8 Lewinsky was kept for several hours by four or five of your
9 lawyers and four or five FBI agents, as if she were a serious
10 felon, these things have become the most important matters in
11 the world. At the moment they were occurring, many other
12 things were going on.

13 I honestly tried to remember when -- you know, if
14 somebody asked you, has anybody ever talked to you about
15 this, you normally think, well, where was the first time I
16 heard that. That's all I was trying to do here. I was not
17 trying to say not Vernon Jordan, but Bruce Lindsey.
18 Everybody knows Vernon Jordan is a friend of mine. I
19 probably would have talked to Vernon Jordan about the Monica
20 Lewinsky problem if he had never been involved in it. So, I
21 was not trying to mislead them. I was trying to answer this
22 question with the first person who told me that.

23 Now, I realize that wasn't the specific question.
24 They were free to ask follow-ups, just like you're asking
25 follow-ups today. And I can't explain why I didn't answer

2/98M

P
A
R
A
M
E
T
E
R
S
O
F
T
W
A
R
E
C
O
M
P
A
N
Y
I
N
C
O
R
P
O
R
A
T
E
D
I
N
T
H
E
U
N
I
T
E
D
S
T
A
T
E
S
O
F
A
M
E
R
I
C
A

be

1 every question in the way you seem to think I should have,
2 and I certainly can't explain why they didn't ask what seemed
3 to me to be logical follow-ups, especially since they spent
4 all that time with Linda Tripp the night before.

5 Q You've told us that you understand your obligation
6 then, as it is now, is to tell the whole truth, sir. Do you
7 recall that?

8 A I took the oath here.

9 Q If Vernon Jordan --

10 A You even read me a definition of the oath.

11 Q If Vernon Jordan has told us that you have an
12 extraordinary memory, one of the greatest memories he's ever
13 seen in a politician, would that be something you would care
14 to dispute?

15 A No, I do have a good memory. At least, I have had
16 a good memory in my life.

17 Q Do you understand that if you answered, "I don't
18 think so", to the question, has anyone other than your
19 attorneys told you that Monica Lewinsky has been served with
20 a subpoena in this case, that if you answered, "I don't think
21 so", but you really knew Vernon Jordan had been telling you
22 all about it, you understand that that would be a false
23 statement, presumably perjurious?

24 A Mr. Wisenberg, I have testified about this three
25 times. Now, I will do it the fourth time. I am not going to

2/98M

PERMANENT RECORDS SECTION

71

2 I -- people don't always hear the same questions in
3 the same way. They don't always answer them in the same way.
4 I was so concerned about the question they asked me that the
5 next question I was asked, I went back to the previous
6 question, trying to give an honest answer about the first
7 time I heard about the Lewinsky subpoena.

15 It's also -- if I could say one thing about my
16 memory. I have been blessed and advantaged in my life with a
17 good memory. Now, I have been shocked, and so have members
18 of my family and friends of mine, at how many things that I
19 have forgotten in the last six years, I think because of the
20 pressure and the pace and the volume of events in the
21 President's life, compounded by the pressure of your four-
22 year inquiry, and all the other things that have happened,
23 I'm amazed there are lots of times when I literally can't
24 remember last week.

25 If you ask me, did you talk to Vernon -- when was

be

1 the last time you talked to Vernon Jordan, what time of day
2 was it, when did you see him, what did you say, my answer was
3 the last -- you know, if you answered [sic] me, when was the
4 last time you saw a friend of yours in California, if you
5 asked me a lot of questions like that, my memory is not what
6 it was when I came here, because my life is so crowded.

7 And now that -- as I said, you have made this the
8 most important issue in America. I mean, you have made it
9 the most important issue in America from your point of view.
10 At the time this was occurring, even though I was concerned
11 about it, and I hoped she didn't have to testify, and I hoped
12 this wouldn't come out, I felt -- I will say again -- that
13 she could honestly fill out an affidavit that, under
14 reasonable circumstances, would relieve her of the burden of
15 testifying.

16 I am not trying to exclude the fact that I talked
17 to Vernon here. I just -- all I can tell you is I believe
18 this answer reflects I was trying to remember the first
19 person who told me who was not Mr. Bennett, and I believe it
20 was Bruce Lindsey.

21 Q As you yourself recalled, just recalled, Mr.
22 President, Vernon Jordan not only discussed the subpoena with
23 you that night, but discussed Frank Carter, the lawyer he had
24 gotten for Ms. Lewinsky. And also Mr. Jordan discussed with
25 you over the next few weeks, after the 19th of December, in

be

1 addition to the job aspects of Ms. Lewinsky's job, he
2 discussed with you her affidavit that she was preparing in
3 the case. Is that correct, sir?

4 A I believe that he did notify us, I think, when she
5 signed her affidavit. I have a memory of that. Or it seems
6 like he said that she had signed her affidavit.

7 Q If he's told us that he notified you around January
8 7th, when she signed her affidavit, and that you generally
9 understood that it would deny a sexual relationship, do you
10 have any reason to doubt that?

11 A No.

12 Q So, that's the affidavit, the lawyer, and the
13 subpoena. And yet when you were asked, sir, at the Jones
14 deposition about Vernon Jordan, and specifically about
15 whether or not he had discussed the lawsuit with you, you
16 didn't reveal that to the Court.

17 I want to refer you to page 72, line 16. It's
18 where this starts. It's going to go down, it might go down
19 somewhat.

20 Line 16. Question, "Has it ever been reported to
21 you that he" -- and that's referring to Mr. Jordan. At line
22 12 you were asked, "You know a man named Vernon Jordan?", and
23 you answer, "I know him well."

24 Going down to 16, "Has it ever been reported to you
25 that he met with Monica Lewinsky and talked about this case?"

2/98M

HP
D
C
B
A
V
O
N
Z
N
E
M
J
N
O
V
O
O
S
S
F
O
C
E
M
E
R
D

be

1 This is your answer, or a portion of it: "I knew that he met
2 with her. I think Betty suggested that he meet with her.
3 Anyway, he met with her. I, I thought that he talked to her
4 about something else."

5 Why didn't you tell the Court, when you were under
6 oath and sworn to tell the truth, the whole truth, and
7 nothing but the truth, that you had been talking with Vernon
8 Jordan about the case, about the affidavit, the lawyer, the
9 subpoena?

10 A Well, that's not the question I was asked. I was
11 not asked any question about -- I was asked, "Has it ever
12 been reported to you that he met with Monica Lewinsky and
13 talked about this case." I believe -- I may be wrong about
14 this -- my impression was that at the time, I was focused on
15 the meetings. I believe the meetings he had were meetings
16 about her moving to New York and getting a job.

17 I knew at some point that she had told him that she
18 needed some help, because she had gotten a subpoena. I'm not
19 sure I know whether she did that in a meeting or a phone
20 call. And I was not, I was not focused on that.

21 I know that, I know Vernon helped her to get a
22 lawyer, Mr. Carter. And I, I believe that he did it after
23 she had called him, but I'm not sure. But I knew that the
24 main source of their meetings was about her move to New York
25 and her getting a job.

2/98M

P E N N S Y L V A N I A
C O U R T
B A Y O N N E
N J
0 7 0 0 2
F O R M
F E D

be

1 Q Are you saying, sir, that you forgot when you were
2 asked this question that Vernon Jordan had come on December
3 19th, just three and a half weeks before, and said that he
4 had met that day, the day that Monica got the subpoena?

5 A It's quite possible -- it's a sort of a jumbled
6 answer. It's quite possible that I had gotten mixed up
7 between whether she had met with him or talked to him on the
8 telephone in those three and a half weeks.

9 Again, I say, sir, just from the tone of your voice
10 and the way you are asking questions here, it's obvious that
11 this is the most important thing in the world, and that
12 everybody was focused on all the details at the time. But
13 that's not the way it worked. I was, I was doing my best to
14 remember.

15 Now, keep in mind, I don't know if this is true,
16 but the news reports are that Linda Tripp talked to you, then
17 went and talked to the Jones lawyers, and, you know, that she
18 prepared them for this. Now, maybe -- you seem to be
19 criticizing me because they didn't ask better questions and,
20 as if you didn't prepare them well enough to sort of set me
21 up or something. I don't know what's going on here.

22 All I can tell you is I didn't remember all the
23 details of all this. I didn't remember what -- when Vernon
24 talked to me about Monica Lewinsky, whether she talked to him
25 on the telephone or had a meeting. I didn't remember all

be

1 those details. I was focused on the fact that Monica went to
2 meet with Vernon after Betty helped him set it up, and had
3 subsequent meetings to talk about her move to New York.

4 Now, keep in mind at this time, at this time, until
5 this date here when it's obvious that something funny's going
6 on here and there's some sort of a gotcha game at work in
7 this deposition, until this date, I didn't know that Ms.
8 Lewinsky's deposition [sic] wasn't going to be sufficient for
9 her to avoid testifying. I didn't, you know --

10 MR. KENDALL: Excuse me, Mr. President, I think --

11 THE WITNESS: So, all these details --

12 MR. KENDALL: -- you mean her affidavit.

13 BY MR. WISENBERG:

14 Q You mean her affidavit?

15 A Excuse me. I'm sorry. Her affidavit. Thank you.

16 So, I don't necessarily remember all the details of
17 all these questions you're asking me, because there was a lot
18 of other things going on, and at the time they were going on,
19 until all this came out, this was not the most important
20 thing in my life. This was just another thing in my life.

21 Q But Vernon Jordan met with you, sir, and he
22 reported that he had met with Monica Lewinsky, and the
23 discussion was about the lawsuit, and you didn't inform,
24 under oath, the Court of that in your deposition?

25 A I gave the best answer I could, based on the best

be

1 memory I had at the time they asked me the question. That's
2 the only answer I can give you, sir.

3 Q And before --

4 A And I think I may have been confused in my memory,
5 because I've also talked to him on the phone about what he
6 said about whether he talked to her or met with her. That's
7 all I can tell you.

8 But, let me say again, I don't have the same view
9 about this deposition -- I mean, this affidavit -- that I
10 think you do. I felt very strongly that Ms. Lewinsky and
11 everybody else that didn't know anything about Paula Jones
12 and anything about sexual harassment, that she and others
13 were themselves being harassed for political purposes, in the
14 hope of getting damaging information that the Jones lawyers
15 could unlawfully leak.

16 Now, I believed then, I believe today, that she
17 could execute an affidavit which, under reasonable
18 circumstances with fair-minded, non politically-oriented
19 people, would result in her being relieved of the burden to
20 be put through the kind of testimony that, thanks to Linda
21 Tripp's work with you and with the Jones lawyers, she would
22 have been put through. I don't think that's dishonest. I
23 don't think that's illegal. I think what they were trying to
24 do to her and all these other people, who knew nothing about
25 sexual harassment, was outrageous, just so they could hurt me

78

1 politically.

2 So, I just don't have the same attitude about it
3 that you do.

4 Q Well, you're not telling our grand jurors that
5 because you think the case was a political case or a setup,
6 Mr. President, that that would give you the right to commit
7 perjury or --

8 A No, sir.

9 Q -- not to tell the full truth?

10 A No, sir. In the face of their, the Jones lawyers,
11 the people that were questioning me, in the face of their
12 illegal leaks, their constant, unrelenting illegal leaks in a
13 lawsuit that I knew and, by the time this deposition and this
14 discovery started, they knew was a bogus suit on the law and
15 a bogus suit on the facts.

16 Q The question is --

17 A In the face of that, I knew that in the face of
18 their illegal activity, I still had to behave lawfully. But
19 I wanted to be legal without being particularly helpful. I
20 thought that was, that was what I was trying to do. And this
21 is the first -- you are the first persons who ever suggested
22 to me that, that I should have been doing their lawyers' work
23 for them, when they were perfectly free to ask follow-up
24 questions. On one or two occasions, Mr. Bennett invited them
25 to ask follow-up questions.

be

1 It now appears to me they didn't because they were
2 afraid I would give them a truthful answer, and that there
3 had been some communication between you and Ms. Tripp and
4 them, and they were trying to set me up and trick me. And
5 now you seem to be complaining that they didn't do a good
6 enough job.

7 I did my best, sir, at this time. I did not know
8 what I now know about this. A lot of other things were going
9 on in my life. Did I want this to come out? No. Was I
10 embarrassed about it? Yes. Did I ask her to lie about it?
11 No. Did I believe there could be a truthful affidavit?
12 Absolutely.

13 Now, that's all I know to say about this. I will
14 continue to answer your questions as best I can.

15 Q You're not going back on your earlier statement
16 that you understood you were sworn to tell the truth, the
17 whole truth, and nothing but the truth to the folks at that
18 deposition, are you, Mr. President?

19 A No, sir, but I think we might as well put this out
20 on the table. You tried to get me to give a broader
21 interpretation to my oath than just my obligation to tell the
22 truth. In other words, you tried to say, even though these
23 people are treating you in an illegal manner in illegally
24 leaking these depositions, you should be a good lawyer for
25 them. And if they don't have enough sense to write -- to ask

be

1 a question, and even if Mr. Bennett invited them to ask
2 follow-up questions, if they didn't do it, you should have
3 done all their work for them.

4 Now, so I will admit this, sir. My goal in this
5 deposition was to be truthful, but not particularly helpful.
6 I did not wish to do the work of the Jones lawyers. I
7 deplored what they were doing. I deplored the innocent
8 people they were tormenting and traumatizing. I deplored
9 their illegal leaking. I deplored the fact that they knew,
10 once they knew our evidence, that this was a bogus lawsuit,
11 and that because of the funding they had from my political
12 enemies, they were putting ahead. I deplored it.

13 But I was determined to walk through the mine field
14 of this deposition without violating the law, and I believe I
15 did.

16 Q You are not saying, are you, Mr. President, in
17 terms of doing the work for the Jones folks, the Jones
18 lawyers, that you could, you could say, as part of your not
19 helping them, "I don't know" to a particular question, when
20 you really knew, and that it was up to them -- even if you
21 really knew the answer, it was up to them to do the follow-
22 up, that you kind of had a one free "I don't know" --

23 A No, sir.

24 Q If I could finish up? I've been very patient, Mr.
25 President, in letting you finish.

2/88M

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

be

1 You didn't think you had a free shot to say, "I
2 don't know", or "I don't recall", but when you really did
3 know and you did recall, and it was just up to them, even if
4 you weren't telling the truth, to do a follow-up and to catch
5 you?

6 A No, sir, I'm not saying that. And if I could give
7 you one example? That's why I felt that I had to come back
8 to that question where I said, I don't know that, and talk
9 about Bruce Lindsey, because I was trying, I was honestly
10 trying to remember how I had first heard this. I wasn't hung
11 up about talking about this.

12 All I'm saying is, the -- let me say something
13 sympathetic to you. I've been pretty tough. So, let me say
14 something sympathetic.

15 All of you are intelligent people. You've worked
16 hard on this. You've worked for a long time. You've gotten
17 all the facts. You've seen a lot of evidence that I haven't
18 seen. And it's, it's an embarrassing and personally painful
19 thing, the truth about my relationship with Ms. Lewinsky.

20 So, the natural assumption is that while all this
21 was going on, I must have been focused on nothing but this;
22 therefore, I must remember everything about it in the
23 sequence and form in which it occurred. All I can tell you
24 is, I was concerned about it. I was glad she saw a lawyer.
25 I was glad she was doing an affidavit. But there were a lot

2/98M

BAYVIEW
CO
N J
07002
FORM
FED

be

1 of other things going on, and I don't necessarily remember it
2 all. And I don't know if I can convince you of that.

3 But I tried to be honest with you about my mindset,
4 about this deposition. And I'm just trying to explain that I
5 don't have the memory that you assume that I should about
6 some of these things.

7 Q I want to talk to you for a bit, Mr. President,
8 about the incident that happened at the Northwest Gate of the
9 White House on December 5th -- sorry, December 6th, 1997. If
10 you would give me just a moment?

11 That was a -- let me ask you first. In early
12 nineteen -- in early December 1997, the Paula Jones case was
13 pending, correct?

14 A Yes, sir.

15 Q You were represented by Mr. Bennett, of course?

16 A That's correct.

17 Q In that litigation?

18 A Yes, I did.

19 Q How --

20 A He was.

21 Q I'm sorry. Go ahead.

22 A No, no. Yes, he was representing me.

23 Q How often did you talk to him or meet with him, if
24 you can just recall, at that time in the litigation?

25 A Well, we met, I would say -- I wish Mr. Ruff were

23 A I believe that I found out late in the afternoon on
24 the 6th. That's what I believe. I've tried to remember with
25 great precision, and because I thought you would ask me about

84

1 this day, I've tried to remember the logical question, which
2 is whether, whether I knew it on the 6th and, if so, at what
3 time.

4 I don't -- I had a meeting in the late afternoon on
5 the 5th, on the 6th -- excuse me, on the 6th -- and I believe
6 that's when I learned about it.

7 Q Now, on the morning of the 6th, Monica Lewinsky
8 came to the Northwest Gate and found out that you were being
9 visited by Eleanor Mondale at the time, and had an extremely
10 angry reaction. You know that, sir, now, don't you?

11 A I have, I have -- I know that Monica Lewinsky came
12 to the gate on the 6th and apparently directly called in and
13 wanted to see me and couldn't, and was angry about it. I
14 know that.

15 Q And she expressed that anger to Betty Currie over
16 the telephone, isn't that correct, sir?

17 A That, Betty told me that.

18 Q And she then later expressed her anger to you in
19 one of her telephone conversations with Betty Currie, is that
20 correct?

21 A You mean did I talk to her on the phone?

22 Q Monica Lewinsky, that day, before she came in to
23 visit in the White House?

24 A Mr. Wisenberg, I remember that she came in to visit
25 that day. I remember that she was upset. I don't recall

be

1 whether I talked to her on the phone before she came in to
2 visit, but I well may have. I'm not denying it that I did.
3 I just don't recall that.

4 Q And Mrs. Currie and yourself were very irate that
5 Ms. Lewinsky had overheard that you were in the Oval Office
6 with a visitor on that day, isn't that correct, that you and
7 Mrs. Currie were very irate about that?

8 A Well, I don't remember all that. What I remember
9 is that she was very -- Monica was very upset. She got upset
10 from time to time. And, and I was, you know, I couldn't see
11 her. I had, I was doing, as I remember, I had some other
12 work to do that morning and she had just sort of showed up
13 and wanted to be let in, and wanted to come in at a certain
14 time and she wanted everything to be that way, and we
15 couldn't see her. Now, I did arrange to see her later that
16 day. And I was upset about her conduct.

17 I'm not sure that I knew or focused on at that
18 moment exactly the question you asked. I remember I was, I
19 thought her conduct was inappropriate that day.

20 Q I want to go back and I want to take them one at a
21 time. Number one, did you find out at some point during that
22 day that Monica had overheard from somebody in the Secret
23 Service that you were meeting with Ms. Mondale, and that
24 Monica got very irate about that?

25 A I knew that at some point. I don't know whether I

2/98M

AMERICAN OVERSIGHT BOARD

be

1 found out that, that day. I knew that day, I knew that
2 somehow she knew that among, that, that Eleanor Mondale was
3 in to see us that day. I knew that. I don't know that I
4 knew how she knew that on that day. I don't remember that.

5 Q That leads into my second question, which is,
6 weren't you irate at the Secret Service precisely because
7 they had revealed this information to Ms. Lewinsky on that
8 very day, so irate that you told several people, or at least
9 one person, that somebody should be fired over this, on that
10 very day?

11 A I don't remember whether it happened on that very
12 day. But, let me tell you that the Uniformed Secret Service,
13 if that is in fact what happened and I will stipulate that
14 that is, that no one should be telling anybody, not anybody,
15 not a member of my staff, who the President is meeting with.
16 That's an inappropriate thing to do.

17 So, I would think that if that, in fact, is what I
18 heard when I heard it, I would have thought that was a bad
19 thing. I don't know that I said that. I don't, I don't
20 remember what I said, and I don't remember to whom I said it.

21 Q It would be an inappropriate thing, sir, and that
22 leads into my next question is that why did Mrs. Currie, on
23 your instructions, later that day tell many of the Secret
24 Service Officers involved that it never happened, to forget
25 about it?

2/98M

AMERICAN OVERSIGHT

be

1 A That what never happened?

2 Q The incident that you were so irate about earlier;
3 the incident of somebody disclosing to Ms. Lewinsky that Ms.
4 Mondale was in the Oval Office?

5 A I don't know the answer to that. I think maybe,
6 you know, I don't know. I don't know the answer.

7 Q You don't recall that you later gave orders to the
8 effect that we are going to pretend this never happened, or
9 something --

10 A No, sir.

11 Q -- like that?

12 A No, sir. I don't recall it. First of all, I don't
13 recall that I gave orders to fire anybody, if that was the
14 implication of your first statement.

15 Q It wasn't an implication. Actually, the question
16 was that you initially wanted somebody fired. You were so
17 mad that you wanted somebody fired.

18 A I don't remember that, first of all. I remember
19 thinking it was an inappropriate thing to do. And I, I, I
20 remember, as I usually do when I'm mad, after awhile I wasn't
21 so mad about it, and I'm quite aware that Ms. Lewinsky has a
22 way of getting information out of people when she's either
23 charming or determined. And it -- I could have just said,
24 well, I'm not so mad about it any more.

25 But I don't remember the whole sequence of events

298M

P E N N S Y L V A N I A
C O B A Y O N N E
N J 0 7 7 0 0 2
F O R M
F E E D

be

1 you're talking to me about now, except I do remember that
2 somehow Monica found out Eleanor Mondale was there. I
3 learned either that day or later that one of the Uniformed
4 Division personnel had told her. I do -- I thought then it
5 was a mistake. I think now it was a mistake. I'm not sure
6 it's a mistake someone should be terminated over. I think
7 that, you know, you could just tell them not to do that any
8 more.

9 Q In fact, it would kind of be an overreaction, to
10 get irate or terminate somebody for revealing to a former
11 White House staffer who visits where the President is, don't
12 you think, sir?

13 A Well, it would depend upon the facts. I think on
14 the whole people in the Uniformed Secret Service who are
15 working on the gate have no business telling anybody anything
16 about the President's schedule, just as a general principal.
17 I didn't mind anybody knowing that she was there, if that's
18 what you're saying. I could care less about that. But I
19 think that the schedule itself -- these uniformed people, you
20 know, somebody shouldn't just be able to come up on the
21 street and, because they know who the Secret Service agent
22 is, he says who the President's with. I don't think that's
23 proper.

24 Q I agree, Mr. President.

25 A But, on the other hand, I didn't, you know, I, I

2/98M

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 07-00-20 BY 60322 FOM/ML

be

1 wanted to know what happened. I think we found out what
2 happened. And then they were, I think, told not to let it
3 happen again, and I think that's the way it should have been
4 handled. I think it was handled in the appropriate way.

5 Q You have no knowledge of the fact that Secret
6 Service officers were told later in the day something to the
7 effect of, this never happened, this event never happened?
8 You have no knowledge of that?

9 A I'm not sure anybody ever told that to me. I mean,
10 I thought you were asking -- let me just say, my
11 interpretation of this, of your previous question was
12 different than what you're asking now.

13 What I remember was being upset that this matter
14 would be discussed that -- by anybody. It's incidental it
15 happened to be Monica Lewinsky. And that, that whatever I
16 said, I don't recall. But then thinking that the appropriate
17 thing to do was to say, look, just this, this is not an
18 appropriate thing for you to be talking about, the
19 President's schedule, and it shouldn't happen again.

20 Now, the question you seem to be asking me now -- I
21 just want to be sure I'm getting the right question -- is
22 whether I gave instructions, in effect, to pretend that
23 Monica Lewinsky was never at the gate. And if --

24 Q To the effect of pretend --

25 A And if that is the question you are asking me, I

2/98M

RECEIVED BY BUREAU OF INVESTIGATION
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

be

90

1 don't believe I ever did that, sir. I certainly have no
2 memory of doing that.

3 Q Or anything to that effect?

4 A I don't know what that means.

5 Q Is that your testimony?

6 A What does that mean, anything to that effect?

7 Q Well, Mr. President, you've told us that you were
8 not going to try to help the Jones attorneys, and I think
9 it's clear from your testimony that you were pretty literal
10 at times. So, that's why I'm saying, I don't necessarily
11 know the exact words. The question was, do you have any
12 knowledge of the fact --

13 A Of that?

14 Q -- of the fact that later in the day, on Saturday,
15 the 6th of December, 1997, Secret Service people were then,
16 were told something to this effect: This event never
17 happened, let's just pretend this event did not happen. Do
18 you have knowledge of it, or not?

19 A No, sir. And I, I didn't instruct the Secret
20 Service in that regard. I have no memory of saying anything
21 to anybody in the Secret Service that would have triggered
22 that kind of instruction.

23 Q Did you tell Captain Purdy, while you were standing
24 in the doorway between the Oval Office and Betty Currie's
25 office, did you tell Captain Purdy of the Uniformed Division,

be

1 I hope I can count on your discretion in this matter? At the
2 end of the day when you all were talking about that earlier
3 incident, did you tell him that or anything like that, sir?

4 A I don't remember anything I said to him in that
5 regard. I have no recollection of that whatever.

6 MR. WISENBERG: Let's take a break now.

7 MR. KENDALL: Thank you, 3:38.

8 (Whereupon, the proceedings were recessed from 3:38 p.m.
9 until 4:01 p.m.)

10 MR. KENDALL: It is 4:01.

11 BY MR. WISENBERG:

12 Q Mr. President, the next series of questions are
13 from the grand jurors. And let me tell you that the grand
14 jurors want you to be more specific about the inappropriate
15 conduct.

16 The first question was, one of the grand jurors has
17 said that you referred to what you did with Ms. Lewinsky as
18 inappropriate contact; what do you mean by that?

19 A I mean just what I said. But I would like to ask
20 the grand jury, because I think I have been quite specific
21 and I think I've been willing to answer some specific
22 questions that I haven't been asked yet, but I do not want to
23 discuss something that is intensely painful to me. This has
24 been tough enough already on me and on my family, although I
25 take responsibility for it. I have no one to blame but myself.

298M

RECORDED
CO
BAYONNE
NJ
07002
FORM
FED

9 Now, you know, if there's any doubt on the part of
10 the grand jurors about whether I believe some kind of
11 activity falls within that definition or outside that
12 definition, I'd be happy to try to answer that.

17 A As I understood it, it was not, no.

24 And so one of the questions from the grand jurors
25 is what basis, what legal basis are you declining to answer

be

1 these questions?

2 A I'm not trying to evade my legal obligations or my
3 willingness to help the grand jury achieve their legal
4 obligations. As I understand it, you want to examine whether
5 you believe I told the truth in my deposition, whether I
6 asked Ms. Lewinsky not to tell the truth, and whether I did
7 anything else with evidence, or in any other way, amounting
8 to an obstruction of justice or a subornation of perjury.
9 And I'm prepared to answer all questions that the grand jury
10 needs to draw that conclusion.

11 Now, respectfully, I believe the grand jurors can
12 ask me if I believe -- just like that grand juror did --
13 could ask me, do you believe that this conduct falls within
14 that definition. If it does, then you are free to conclude
15 that my testimony is that I didn't do that. And I believe
16 that you can achieve that without requiring me to say and do
17 things that I don't think are necessary and that I think,
18 frankly, go too far in trying to criminalize my private life.

19 Q If a person touched another person, if you touched
20 another person on the breast, would that be, in your view,
21 and was it within your view, when you took the deposition,
22 within the definition of sexual relations?

23 A If the person being deposed --

24 Q Yes.

25 A -- in this case, me, directly touched the breast of

2/98M

P E N N S Y L V A N I A C O C K B A Y O N N E J 0 7 0 0 2 F O R M F E D

be

1 another person, with the purpose to arouse or gratify, under
2 that definition that would be included.

3 Q Only directly, sir, or would it be directly or
4 through clothing?

5 A Well, I would -- I think the common sense
6 definition would be directly. That's how I would infer what
7 it means.

8 Q If the person being deposed kissed the breast of
9 another person, would that be in the definition of sexual
10 relations as you understood it when you were under oath in
11 the Jones case?

12 A Yes, that would constitute contact. I think that
13 would. If it were direct contact, I believe it would. I --
14 maybe I should read it again, just to make sure.

15 Because this basically says if there was any direct
16 contact with an intent to arouse or gratify, if that was the
17 intent of the contact, then that would fall within the
18 definition. That's correct.

19 Q So, touching, in your view then and now -- the
20 person being deposed touching or kissing the breast of
another person would fall within the definition?

22 A That's correct, sir.

23 Q And you testified that you didn't have sexual
24 relations with Monica Lewinsky in the Jones deposition, under
25 that definition, correct?

2/98M

P E N N S Y L V A N I A
C O C O B A Y O N N E
N J 0 7 0 0 2
F O R M
F E E D

be

1 A That's correct, sir.

2 Q If the person being deposed touched the genitalia
3 of another person, would that be -- and with the intent to
4 arouse the sexual desire, arouse or gratify, as defined in
5 definition (1), would that be, under your understanding then
6 and now --

7 A Yes, sir.

8 Q -- sexual relations?

9 A Yes, sir.

10 Q Yes, it would?

11 A Yes, it would. If you had a direct contact with
12 any of these places in the body, if you had direct contact
13 with intent to arouse or gratify, that would fall within the
14 definition.

15 Q So, you didn't do any of those three things --

16 A You --

17 Q -- with Monica Lewinsky?

18 A You are free to infer that my testimony is that I
19 did not have sexual relations, as I understood this term to
20 be defined.

21 Q Including touching her breast, kissing her breast,
22 or touching her genitalia?

23 A That's correct.

24 Q Would you agree with me that the insertion of an
25 object into the genitalia of another person with the desire

2/98M

P E N N S Y L V A N I A
C O C O B A Y O N N E
J N 0 7 0 0 2
F O R M F E E D

be

1 to gratify sexually would fit within the definition used in
2 the Jones case as sexual relations?

3 A There's nothing here about that, is there? I don't
4 know that I ever thought about that one way or the other.

5 Q The question is, under the definition as you
6 understood it then, under the definition as you understand it
7 now -- pardon me just a minute.

8 Pardon me, Mr. President.

9 (Pause)

10 Deposition Exhibit 1, question 1, under the -- in
11 the Jones case, Definition of Sexual Relations --

12 MR. KENDALL: Do you have that before you, Mr.
13 President? Excuse me.

14 THE WITNESS: I do, sir.

15 MR. KENDALL: Good.

16 THE WITNESS: I've got it right here. I'm looking
17 at it.

18 BY MR. WISENBERG:

19 Q As you understood the definition then, and as you
20 understood it now, would it include sticking an object into
21 the genitalia of another person in order to arouse or gratify
22 the sexual desire of any person? Would it constitute, in
23 other words, contact with the genitalia?

24 A I don't know the answer to that. I suppose you
25 could argue that since section 2, paragraph (2) was

2/98M

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 07-08-2000 BY 60322
FBI/DOJ

be

1 eliminated, and paragraph (2) actually dealt with the object
2 issue, that perhaps whoever wrote this didn't intend for
3 paragraph (1) to cover an object, and basically meant direct
4 contact.

5 So, if I were asked -- I've not been asked this
6 question before. But I guess that's the way I would read it.

7 Q If it -- that it would not be covered? That
8 activity would not be covered?

9 A That's right. If the activity you just mentioned
10 would be covered in number (2), and number (2) were stricken,
11 I think you can infer logically that paragraph (1) was not
12 intended to cover it. But, as I said, I've not been asked
13 this before. I'm just doing the best I can.

14 Q Well, if someone were to hold or a judge were to
15 hold that you are incorrect and that definition (1) does
16 include the hypo I've given to you -- because we're talking
17 in hypos, so that you don't -- under your request here, if
18 someone were to tell you or rule that you are wrong, that the
19 insertion of an object into somebody else's genitalia with
20 the intent to arouse or gratify the sexual desire of any
21 person is within definition (1) --

22 MR. KENDALL: Mr. Wisenberg, excuse me. I have not
23 objected heretofore to any question you've asked. I must
24 tell you, I cannot understand that question. I think it's
25 improper. And, if the witness can understand it, he may

2/98M

P E N N S Y L V A N I A
C O U R T R E C O R D
B A Y O N N E
N J 0 7 0 0 2
F O R M F E E D

be

1 answer.

2 MR. WISENBERG: I'll be happy to rephrase it.

3 BY MR. WISENBERG:

4 Q If you're wrong and it's within definition (1), did
5 you engage in sexual relations under the definition, with
6 Monica Lewinsky?

7 A But, Mr. Wisenberg, I have said all along that I
8 would say what I thought it meant, and you can infer that I
9 didn't. This is an unusual question, but it's a slippery
10 slope. We can -- I have tried to deal with some very
11 delicate areas here, and, and in one case I've given you a
12 very forthright answer about what I thought was not within
13 here.

14 All I can tell you is, whatever I thought was
15 covered, and I thought about this carefully. And let me just
16 point out, this was uncomfortable for me. I had to
17 acknowledge, because of this definition, that under this
18 definition I had actually had sexual relations once with
19 Gennifer Flowers, a person who had spread all kinds of
20 ridiculous, dishonest, exaggerated stories about me for
21 money. And I knew when I did that, it would be leaked. It
22 was. And I was embarrassed. But I did it.

23 So, I tried to read this carefully. I can tell you
24 what I thought it covered, and I can tell you that I do not
25 believe I did anything that I thought was covered by this.

be

1 Q As I understand your testimony, Mr. President,
2 touching somebody's breast with the intent to arouse, with
3 the intent to arouse or gratify the sexual desire of any
4 person is covered; kissing the breast is covered; touching
5 the genitalia is covered; correct?

6 MR. KENDALL: In fairness, the witness said
7 directly in each one of those cases.

8 BY MR. WISENBERG:

9 Q Directly, is covered, correct?

10 A I believe it is, yes, sir.

11 Q Oral sex, in your view, is not covered, correct?

12 A If performed on the deponent.

13 Q Is not covered, correct?

14 A That's my reading of this number (1).

15 Q And you are declining to answer the hypothetical
16 about insertion of an object.

17 I need to inform you, Mr. President -- we'll go on,
18 at least for now. But I need to inform you that the grand
19 jury will consider your not answering the questions more
20 directly in their determination of whether or not they are
21 going to issue another subpoena.

22 Let me switch the topic and talk to you about John
23 Podesta and some of the other aides you've met with and spoke
24 to after this story became public on January 21st, 1998, the
25 day of The Washington Post story.

2/98M

RECEIVED
JULY 10 1998
FBI

be

100

1 Do you recall meeting with him around January 23rd,
2 1998, a Friday a.m. in your study, two days after The
3 Washington Post story, and extremely explicitly telling him
4 that you didn't have, engage in any kind of sex, in any way,
5 shape or form, with Monica Lewinsky, including oral sex?

6 A I meet with John Podesta almost every day. I meet
7 with a number of people. The only thing I -- what happened
8 in the couple of days after what you did was revealed, is a
9 blizzard to me. The only thing I recall is that I met with
10 certain people, and a few of them I said I didn't have sex
11 with Monica Lewinsky, or I didn't have an affair with her or
12 something like that. I had a very careful thing I said, and
13 I tried not to say anything else.

14 And it might be that John Podesta was one of them.
15 But I do not remember this specific meeting about which you
16 asked, or the specific comments to which you refer. And --

17 Q You don't remember --

18 A -- seven months ago, I'd have no way to remember,
19 no.

20 Q You don't remember denying any kind of sex in any
21 way, shape or form, and including oral sex, correct?

22 A I remember that I issued a number of denials to
23 people that I thought needed to hear them, but I tried to be
24 careful and to be accurate, and I do not remember what I said
25 to John Podesta.

2/98M

A
B
C
D
E
F
G
H
I
J
K
L
M
N
O
P
Q
R
S
T
U
V
W
X
Y
Z

be

101

1 Q Surely, if you told him that, that would be a
2 falsehood, correct?

3 A No, I didn't say that, sir. I didn't say that at
4 all. That is not covered by the definition and I did not
5 address it in my statement.

6 Q Well, let me ask you then. If you told him --
7 perhaps he thought it was covered, I don't know. But if you
8 told him, if you denied to him sex in any way, shape or form,
9 kind of similar to what Mr. Bennett did at the deposition,
10 including oral sex, wouldn't that have been a falsehood?

11 A Now, Mr. Wisenberg, I told you in response to a
12 grand juror's question, you asked me did I believe that oral
13 sex performed on the person being deposed was covered by that
14 definition, and I said no. I don't believe it's covered by
15 the definition.

16 I said you are free to conclude that I did not do
17 things that I believe were covered by the definition, and you
18 have asked me a number of questions and I have acknowledged
19 things that I believe are covered by the definition. Since
20 that was not covered by the definition, I want to fall back
21 on my statement.

22 Look, I'm not trying to be evasive here. I'm
23 trying to protect my privacy, my family's privacy, and I'm
24 trying to stick to what the deposition was about. If the
25 deposition wasn't about this and didn't cover it, then I

2/98M

P E N N S Y L V A N I A C O U R T S F O R M J U D I C I A L

be

1 don't believe that I should be required to go beyond my
2 statement.

3 Q Mr. President, it's not our intent to embarrass
4 you. But since we have to look, among other things, at
5 obstruction of justice, questions of obstruction of justice
6 and perjury, the answer to some of these delicate and
7 unfortunate questions are absolutely required. And that is
8 the purpose that we have to ask them for.

9 A It's not --

10 Q I'm unaware of any --

11 A Mr. Wisenberg, with respect, you don't need to know
12 the answer for that, if the answer, no matter what the answer
13 is, wouldn't constitute perjury because it wasn't sexual
14 relations as defined by the Judge.

15 Q Mister --

16 A The only reason you need to know that is for some
17 other reason. It couldn't have anything to do with perjury.

18 Q Mr. President, one of the, one of the nice things
19 about -- one of the normal things about an investigation and
20 a grand jury investigation is that the grand jurors and the
21 prosecutors get to ask the questions unless they are
22 improper, and unless there is a legal basis.

23 As I understand from your answers, there is no
24 legal basis for which you decline to answer these questions.
25 And I'll ask you again to answer the question. unaware

be

1 of any legal basis for you not to. If you told --

2 MR. KENDALL: Mr. Wisenberg, could you just restate
3 the question, please?

4 BY MR. WISENBERG:

5 Q The question is, if you told John Podesta two days
6 after the story broke something to this effect, that you
7 didn't have any kind of sex in any way, shape or form,
8 including oral sex with Ms. Lewinsky, were you telling him
9 the truth?

10 A And let me say again, with respect, this is an
11 indirect way to try to get me to testify to questions that
12 have no bearing on whether I committed perjury. You
13 apparently agree that it has no bearing --

14 Q Oh, I don't --

15 A -- no bearing on whether I --

16 Q I don't agree.

17 A -- committed perjury.

18 Q Mr. President, I'm sorry, with respect, I don't
19 agree with that. I'm not going to argue with you about it.
20 I just am going to ask you again, in fact direct you to
21 answer the question.

22 A I'm not going to answer that question, because I
23 believe it's a question about conduct that, whatever the
24 answer to it is, would, does not bear on the perjury because
25 oral sex performed on the deponent under this definition is

2/98M

AMERICAN BAR ASSOCIATION
JULY 1998

be

1 not sexual relations. It is not covered by this definition.

2 MR. KENDALL: The witness is not declining to tell
3 you anything he said to John Podesta.

4 BY MR. WISENBERG:

5 Q You denied the --

6 MR. WISENBERG: The witness is not declining to
7 tell me anything?

8 BY MR. WISENBERG:

9 Q Did you deny oral sex in any way, shape or form, to
10 John Podesta?

11 A I told you, sir, before, and I will say again, in
12 the aftermath of this story breaking, and what was told about
13 it, the next two days, next three days are just a blur to me.
14 I don't remember to whom I talked, when I talked to them, or
15 what I said.

16 Q So, you are not declining to answer, you just don't
17 remember?

18 A I honestly don't remember, no.

19 Q Okay.

20 A I'm not saying that anybody who had a contrary
21 memory is wrong. I do not remember.

22 Q Do you recall denying any sexual relationship with
23 Monica Lewinsky to the following people: Harry Thomasson,
24 Erskine Bowles, Harold Ickes, Mr. Podesta, Mr. Blumenthal,
25 Mr. Jordan, Ms. Betty Currie? Do you recall denying any

2/98M

RECEIVED
JAN 20 1998
FBI
NEW YORK

be

105

1 sexual relationship with Monica Lewinsky to those
2 individuals?

3 A I recall telling a number of those people that I
4 didn't have, either I didn't have an affair with Monica
5 Lewinsky or didn't have sex with her. And I believe, sir,
6 that -- you'll have to ask them what they thought. But I was
7 using those terms in the normal way people use them. You'll
8 have to ask them what they thought I was saying.

9 Q If they testified that you denied sexual relations
10 or relationship with Monica Lewinsky, or if they told us that
11 you denied that, do you have any reason to doubt them, in the
12 days after the story broke; do you have any reason to doubt
13 them?

14 A No. The -- let me say this. It's no secret to
15 anybody that I hoped that this relationship would never
16 become public. It's a matter of fact that it had been many,
17 many months since there had been anything improper about it,
18 in terms of improper contact. I --

19 Q Did you deny it to them or not, Mr. President?

20 A Let me finish. So, what -- I did not want to
21 mislead my friends, but I wanted to find language where I
22 could say that. I also, frankly, did not want to turn any of
23 them into witnesses, because I -- and, sure enough, they all
24 became witnesses.

25 Q Well, you knew they might be --

be

106

1 A And so --

2 Q -- witnesses, didn't you?

3 A And so I said to them things that were true about
4 this relationship. That I used -- in the language I used, I
5 said, there's nothing going on between us. That was true. I
6 said, I have not had sex with her as I defined it. That was
7 true. And did I hope that I would never have to be here on
8 this day giving this testimony? Of course.

9 But I also didn't want to do anything to complicate
10 this matter further. So, I said things that were true. They
11 may have been misleading, and if they were I have to take
12 responsibility for it, and I'm sorry.

13 Q It may have been misleading, sir, and you knew
14 though, after January 21st when the Post article broke and
15 said that Judge Starr was looking into this, you knew that
16 they might be witnesses. You knew that they might be called
17 into a grand jury, didn't you?

18 A That's right. I think I was quite careful what I
19 said after that. I may have said something to all these
20 people to that effect, but I'll also -- whenever anybody
21 asked me any details, I said, look, I don't want you to be a
22 witness or I turn you into a witness or give you information
23 that could get you in trouble. I just wouldn't talk. I, by
24 and large, didn't talk to people about this.

25 Q If all of these people -- let's leave out Mrs.

2/98M

P
H
E
R
E
B
Y
O
N
O
T
A
R
E
C
O
N
S
I
D
E
R
E
D
A
S
E
R
I
O
U
S
L
Y

107

6	A	No.
---	---	-----

8 A I'm just telling you what I meant by it. I told
9 you what I meant by it when they started this deposition.

12 A It might have been. Since we have seen this four-
13 year, \$40-million-investigation come down to parsing the
14 definition of sex, I think it might have been. I don't think
15 at the time that I thought that's what this was going to be
16 about.

24 So, what I was trying to do was to give them
25 something they could -- that would be true, even if

be

1 misleading in the context of this deposition, and keep them
2 out of trouble, and let's deal -- and deal with what I
3 thought was the almost ludicrous suggestion that I had urged
4 someone to lie or tried to suborn perjury, in other words.

5 Q I want to go over some questions again. I don't
6 think you are going to answer them, sir. And so I don't need
7 a lengthy response, just a yes or a no. And I understand the
8 basis upon which you are not answering them, but I need to
9 ask them for the record.

10 If Monica Lewinsky says that while you were in the
11 Oval Office area you touched her breasts, would she be lying?

12 A Let me say something about all this.

13 Q All I really need for you, Mr. President --

14 A I know.

15 Q -- is to say --

16 A But you --

17 Q -- I won't answer under the previous grounds, or to
18 answer the question, you see, because we only have four
19 hours, and your answers --

20 A I know.

21 Q -- have been extremely lengthy.

22 A I know that. I'll give you four hours and 30
23 seconds, if you'll let me say something general about this.
24 I will answer to your satisfaction that I won't -- based on
25 my statement, I will not answer. I would like 30 seconds at

2/98M

P E N N A D C O B A Y O N N E N J 0 7 0 0 2 F O R M F E D

be

109

1 the end to make a statement, and you can have 30 seconds more
2 on your time, if you'll let me say this to the grand jury and
3 to you. And I don't think it's disrespectful at all. I've
4 had a lot of time to think about this.

5 But, go ahead and ask your questions.

6 Q The question is, if Monica Lewinsky says that while
7 you were in the Oval Office area you touched her breasts,
8 would she be lying?

9 A That is not my recollection. My recollection is
10 that I did not have sexual relations with Ms. Lewinsky and
11 I'm staying on my former statement about that.

12 Q If she said --

13 A My, my statement is that I did not have sexual
14 relations as defined by that.

15 Q If she says that you kissed her breasts, would she
16 be lying?

17 A I'm going to revert to my former statement.

18 Q Okay. If Monica Lewinsky says that while you were
19 in the Oval Office area you touched her genitalia, would she
20 be lying? And that calls for a yes, no, or reverting to your
21 former statement.

22 A I will revert to my statement on that.

23 Q If Monica Lewinsky says that you used a cigar as a
24 sexual aid with her in the Oval Office area, would she be
25 lying? Yes, no, or won't answer?

2/98M

P E N N S Y L V A N I A
B A Y O N N E
J
0 7 0 0 2
F O R M
T E D

be

110

1 A I will revert to my former statement.

2 Q If Monica Lewinsky says that you had phone sex with
3 her, would she be lying?

4 A Well, that is, at least in general terms, I think,
5 is covered by my statement. I addressed that in my
6 statement, and that, I don't believe, is --

7 Q Let me define phone sex for purposes of my
8 question. Phone sex occurs when a party to a phone
9 conversation masturbates while the other party is talking in
10 a sexually explicit manner. And the question is, if Monica
11 Lewinsky says that you had phone sex with her, would she be
12 lying?

13 A I think that is covered by my statement.

14 Q Did you, on or about January the 13th, 1998, Mr.
15 President, ask Erskine Bowles to ask John Hilley if he would
16 give a recommendation for Monica Lewinsky?

17 A In 1998?

18 Q Yes. On or about January 13th, 1998, did you ask
19 Erskine Bowles, your Chief of Staff, if he would ask John
20 Hilley to give a recommendation for Monica Lewinsky?

21 A At some point, sir, I believe I talked to Erskine
22 Bowles about whether Monica Lewinsky could get a
23 recommendation that was not negative from the Legislative
24 Affairs Office. I believe I did.

25 Q I just didn't hear the very last part.

be

111

1 A I think the answer is, I think, yes. At some point
2 I talked to Erskine Bowles about this.

3 Q Okay.

4 A I do not know what the date was. At some point I
5 did talk to him.

6 Q And if Erskine Bowles has told us that he told John
7 Podesta to carry out your wishes, and John Podesta states
8 that it was three or four days before your deposition, which
9 would be the 13th or the 14th, are you in a position to deny
10 that?

11 A The 13th or 14th of?

12 Q January, as to date.

13 A I don't know. I don't know when the date was.

14 Q Okay.

15 A I'm not in a position to deny it. I won't deny it.
16 I'm sure that they are both truthful men. I don't know when
17 the date was.

18 Q Do you recall asking Erskine Bowles to do that?

19 A I recall talking to Erskine Bowles about that, and
20 my recollection is, sir, that Ms. Lewinsky was moving to New
21 York, wanted to get a job in the private sector; was
22 confident she would get a good recommendation from the
23 Defense Department; and was concerned that because she had
24 been moved from the Legislative Affairs Office, transferred
25 to the Defense Department, that her ability to get a job

2/98M

P
H
E
N
C
O
D
E
S
B
A
Y
O
Z
O
N
E
R
E
N
J
D
7
0
0
0
2
F
O
R
M
F
E
E

be

112

1 might be undermined by a bad recommendation from the
2 Legislative Affairs Office.

3 So, I asked Erskine if we could get her a
4 recommendation that just was at least neutral, so that if she
5 had a good recommendation from the Defense Department it
6 wouldn't prevent her from getting a job in the private
7 sector.

8 Q If Mr. Bowles has told us that, in fact, you told
9 him that she already had a job and had already listed Mr.
10 Hilley as a reference and wanted him to be available as a
11 recommendation, would you be in -- is that inconsistent with
12 your memory?

13 A A little bit, but I think -- my memory is that when
14 you're, when you get a job like that you have to give them a
15 resume, which says where you've worked and who your
16 supervisor was. And I think that that's my recollection. My
17 recollection is that -- slightly different from that.

18 Q And who was it that asked you to do that on Monica
19 Lewinsky's behalf?

20 A I think she did. You know, she tried for months
21 and months to get a job back in the White House, not so much
22 in the West Wing but somewhere in the White House complex,
23 including the Old Executive Office Building. And she talked
24 to Marsha Scott, among others. She very much wanted to come
25 back. And she interviewed for some jobs but never got one.

be

113

1 She was, from time to time, upset about it.

2 And I think what she was afraid of is that she
3 couldn't get a -- from the minute she left the White House
4 she was worried about this. That if she didn't come back to
5 the White House and work for awhile and get a good job
6 recommendation, that no matter how well she had done at the
7 Pentagon it might hurt her future employment prospects.

8 Well, it became obvious that, you know, her mother
9 had moved to New York. She wanted to go to New York. She
10 wasn't going to get a job in the White House. So, she wanted
11 to get a job in the private sector, and said, I hope that I
12 won't get a letter out of the Legislative Affairs Office that
13 will prevent my getting a job in the private sector. And
14 that's what I talked to Erskine about.

15 Now, that's my entire memory of this.

16 Q All right. I want to go back briefly to the
17 December 28th conversation with Ms. Lewinsky. I believe you
18 testified to the effect that she asked you, what if they ask
19 me about gifts you gave me. My question to you is, after
20 that statement by her, did you ever have a conversation with
21 Betty Currie about gifts, or picking something up from Monica
22 Lewinsky?

23 A I don't believe I did, sir. No.

24 Q You never told her anything to this effect, that
25 Monica has something to give you?

be

114

1 A No, sir.

2 Q That is to say, Betty Currie?

3 A No, sir, I didn't. I don't have any memory of that
4 whatever.

5 Q And so you have no knowledge that, or you had no
6 knowledge at the time, that Betty Currie went and picked up,
7 your secretary went and picked up from Monica Lewinsky items
8 that were called for by the Jones subpoena and hid them under
9 her bed? You had no knowledge that anything remotely like
10 that was going to happen?

11 A I did not. I did not know she had those items, I
12 believe, until that was made public.

13 Q And you agree with me that that would be a very
14 wrong thing to do, to hide evidence in a civil case, or any
15 case? Isn't that true?

16 A Yes. I don't know that, that Ms. Currie knew that
17 that's what she had at all. But --

18 Q I'm not saying she did. I'm just saying --

19 A I had -- it is, if Monica Lewinsky did that after
20 they had been subpoenaed and she knew what she was doing, she
21 should not have done that.

22 Q And if you knew, you --

23 A And I --

24 Q -- shouldn't have done it?

25 A Indeed, I, myself, told her, if they ask you for

2/98M

P E N N S Y L V A N I A C O B A Y O N N E N J 0 7 0 0 2 F O R M F E D

be

115

1 gifts you have to give them what you have. And I don't
2 understand if, in fact, she was worried about this, why she
3 was so worried about it. It was no big deal.

4 Q I want to talk about a December 17th phone
5 conversation you had with Monica Lewinsky at approximately
6 2:00 a.m. Do you recall making that conversation and telling
7 her initially about the death of Betty's brother, but then
8 telling her that she was on the witness list, and that it
9 broke your heart that she was on the witness list?

10 A No, sir, I don't, but it would -- it, it would --
11 it is quite possible that that happened, because, if you
12 remember, earlier in this meeting you asked me some questions
13 about what I'd said to Monica about testimony and affidavits,
14 and I was struggling to try to remember whether this happened
15 in a meeting or a phone call.

16 Now, I remember I called her to tell her Betty's
17 brother had died. I remember that. And I know it was in the
18 middle of December, and I believe it was before Monica had
19 been subpoenaed. So, I think it is quite possible that if I
20 called her at that time and had not talked to her since the
21 6th -- and you asked me this earlier -- I believe when I saw
22 her on the 6th, I don't think I knew she was on the witness
23 list then, then it's quite possible I would say something
24 like that. I don't have any memory of it, but I certainly
25 wouldn't dispute that I might have said that.

2/98M

P E E
R S O N
O C C U P A T I O N
C O D E
B A Y O N N E
N J
0 7 0 0 2
F O R M
F E E D

be

1 Q And in that conversation, or in any conversation in
2 which you informed her she was on the witness list, did you
3 tell her, you know, you can always say that you were coming
4 to see Betty or bringing me letters? Did you tell her
5 anything like that?

6 A I don't remember. She was coming to see Betty. I
7 can tell you this. I absolutely never asked her to lie.

8 Q Sir, every time she came to see Betty and you were
9 in the Oval Office, she was coming to see you, too, wasn't
10 she, or just about every time?

11 A I think just about every time. I don't think every
12 time. I think there was a time or two where she came to see
13 Betty when she didn't see me.

14 Q So, do you remember telling her any time, any time
15 when you told her, or after you told her that she was on the
16 witness list, something to this effect: You know, you can
17 always say you were coming to see Betty, or you were bringing
18 me letters?

19 A I don't remember exactly what I told her that
20 night.

21 Q Did you --

22 A I don't remember that. I remember talking about
23 the nature of our relationship, how she got in. But I also
24 will tell you that I felt quite comfortable that she could
25 have executed a truthful affidavit, which would not have

be

117

1 disclosed the embarrassing details of the relationship that
2 we had had, which had been over for many, many months by the
3 time this incident occurred.

4 Q Did you tell her anytime in December something to
5 that effect: You know, you can always say that you were
6 coming to see Betty or you were bringing me letters? Did you
7 say that, or anything like that, in December '97 or January
8 '98, to Monica Lewinsky?

9 A Well, that's a very broad question. I do not
10 recall saying anything like that in connection with her
11 testimony. I could tell you what I do remember saying, if
12 you want to know. But I don't -- we might have talked about
13 what to do in a non legal context at some point in the past,
14 but I have no specific memory of that conversation.

15 I do remember what I said to her about the possible
16 testimony.

17 Q You would agree with me, if you did say something
18 like that to her, to urge her to say that to the Jones
19 people, that that would be part of an effort to mislead the
20 Jones people, no matter how evil they are and corrupt?

21 A I didn't say they were evil. I said what they were
22 doing here was wrong, and it was.

23 Q Wouldn't that be misleading?

24 A Well, again, you are trying to get me to
25 characterize something that I'm -- that I don't know if I

2/98M

P
R
O
C
E
S
S
I
N
G
B
A
Y
O
N
N
E
N
J
0
7
0
0
2
F
O
R
M
F
E
E

be

118

1 said or not, without knowing whether the whole, whether the
2 context is complete or not. So, I would have to know, what
3 was the context, what were all the surrounding facts.

4 I can tell you this: I never asked Ms. Lewinsky to
5 lie. The first time that she raised with me the possibility
6 that she might be a witness or I told her -- you suggested
7 the possibility in this December 17th timeframe -- I told her
8 she had to get a lawyer. And I never asked her to lie.

9 Q Did you ever say anything like that, you can always
10 say that you were coming to see Betty or bringing me letters?
11 Was that part of any kind of a, anything you said to her or a
12 cover story, before you had any idea she was going to be part
13 of Paula Jones?

14 A I might well have said that.

15 Q Okay.

16 A Because I certainly didn't want this to come out,
17 if I could help it. And I was concerned about that. I was
18 embarrassed about it. I knew it was wrong. And, you know,
19 of course, I didn't want it to come out. But --

20 Q But you are saying that you didn't say anything --
21 I want to make sure I understand. Did you say anything like
22 that once you knew or thought she might be a witness in the
23 Jones case? Did you repeat that statement, or something like
24 it to her?

25 A Well, again, I don't recall, and I don't recall

be

119

1 whether I might have done something like that, for example,
2 if somebody says, what if the reporters ask me this, that or
3 the other thing. I can tell you this: In the context of
4 whether she could be a witness, I have a recollection that
5 she asked me, well, what do I do if I get called as a
6 witness, and I said, you have to get a lawyer. And that's
7 all I said. And I never asked her to lie.

8 Q Did you tell her to tell the truth?

9 A Well, I think the implication was she would tell
10 the truth. I've already told you that I felt strongly that
11 she could issue, that she could execute an affidavit that
12 would be factually truthful, that might get her out of having
13 to testify. Now, it obviously wouldn't if the Jones people
14 knew this, because they knew that if they could get this and
15 leak it, it would serve their larger purposes, even if the
16 judge ruled that she couldn't be a witness in the case. The
17 judge later ruled she wouldn't be a witness in the case. The
18 judge later ruled the case had no merit.

19 So, I knew that. And did I hope she'd be able to
20 get out of testifying on an affidavit? Absolutely. Did I
21 want her to execute a false affidavit? No, I did not.

22 Q If Monica Lewinsky has stated that her affidavit
23 that she didn't have a sexual relationship with you is, in
24 fact, a lie, I take it you disagree with that?

25 A No. I told you before what I thought the issue was

2/98M

P
C
C
B
A
Y
O
N
N
E
J
0
7
0
0
2
F
O
R
M
E
D

be

120

1 there. I think the issue is how do you define sexual
2 relationship. And there was no definition imposed on her at
3 the time she executed the affidavit. Therefore, she was free
4 to give it any reasonable meaning.

5 Q And if she says she was lying --

6 A And I believe --

7 Q -- under your common sense ordinary meaning that
8 you talked about earlier, Mr. President, that most Americans
9 would have, if she says sexual relationship, saying I didn't
10 have one was a lie because I had oral sex with the President,
11 I take it, you would disagree with that?

12 A Now, we're back to where we started and I have to
13 invoke my statement. But, let me just say one thing. I've
14 read a lot, and obviously I don't know whether any of it's
15 accurate, about what she said, and what purports to be on
16 those tapes.

17 And this thing -- and I searched my own memory.
18 This reminds me, to some extent, of the hearings when
19 Clarence Thomas and Anita Hill were both testifying under
20 oath. Now, in some rational way, they could not have both
21 been telling the truth, since they had directly different
22 accounts of a shared set of facts. Fortunately, or maybe you
23 think unfortunately, there was no special prosecutor to try
24 to go after one or the other of them, to take sides and try
25 to prove one was a liar. And so, Judge Thomas was able to go

be

121

1 on and serve on the Supreme Court.

2 What I learned from that, I can tell you that I was
3 a citizen out there just listening. And when I heard both of
4 them testify, what I believed after it was over, I believed
5 that they both thought they were telling the truth.

6 This is -- you're dealing with, in some ways, the
7 most mysterious area of human life. I'm doing the best I can
8 to give you honest answers.

9 Q Mr. President --

10 A And that's all I can say.

11 Q I'm sorry.

12 A And, you know, those people both testified under
13 oath. So, if there'd been a special prosecutor, they could,
14 one of them could have gone after Anita Hill, another could
15 have gone after Clarence Thomas. I thank God there was no
16 such thing then, because I don't believe that it was a proper
17 thing.

18 Q One of --

19 A And I think they both thought they were telling the
20 truth. So, maybe Ms. Lewinsky believes she's telling the
21 truth, and I'm glad she got her mother and herself out of
22 trouble. I'm glad you gave her that sweeping immunity. I'm
23 glad for the whole thing. I, I, I -- it breaks my heart that
24 she was ever involved in this.

25 Q I want to go back to a question about Vernon

2/98M

P E R M A N E N T R E C O R D
B A Y O N N E
N J 0 7 0 0 2
F O R M
F E D

be

122

1 Jordan. I want to go back to late December and early
2 January, late December of '97 and early January of '98.
3 During this time, Mr. President, you are being sued for
4 sexual harassment by a woman who claims, among other things,
5 that others got benefits that she didn't because she didn't
6 have oral sex with you. While this is happening, your
7 powerful friend, Vernon Jordan, is helping to get Monica
8 Lewinsky a job and a lawyer. He's helping to get a job and a
9 lawyer for someone who had some kind of sex with you, and who
10 has been subpoenaed in the very case, the Jones case.

11 Don't you see a problem with this? Didn't you see
12 a problem with this?

13 A No. Would you like to know why?

14 Q Isn't that why -- I would. But isn't that why
15 Vernon Jordan asked you on December 19th whether or not you
16 had sexual relationships with Monica Lewinsky and why he
17 asked her, because he knew it would be so highly improper to
18 be helping her with a lawyer and a job if, in fact, she had
19 had a relationship with you?

20 A I don't know. I don't believe that at all. I
21 don't believe that at all, particularly since, even if you
22 look at the facts here in their light most unfavorable to me,
23 no one has suggested that there was any sexual harassment on
24 my part. And I don't think it was wrong to be helping her.
25 Look --

be

123

1 Q A subpoenaed witness in a case against you?

2 A Absolutely. Look, for one thing, I had already
3 proved in two ways that I was not trying to influence her
4 testimony. I didn't order her to be hired at the White
5 House. I could have done so. I wouldn't do it. She tried
6 for months to get in. She was angry.

7 Secondly, after I --

8 Q Wasn't she kept --

9 A After I terminated the improper contact with her,
10 she wanted to come in more than she did. She got angry when
11 she didn't get in sometimes. I knew that that might make her
12 more likely to speak, and I still did it because I had to
13 limit the contact.

14 And, thirdly, let me say, I formed an opinion
15 really early in 1996, and again -- well, let me finish the
16 sentence. I formed an opinion early in 1996, once I got into
17 this unfortunate and wrong conduct, that when I stopped it,
18 which I knew I'd have to do and which I should have done a
19 long time before I did, that she would talk about it. Not
20 because Monica Lewinsky is a bad person. She's basically a
21 good girl. She's a good young woman with a good heart and a
22 good mind. I think she is burdened by some unfortunate
23 conditions of her, her upbringing. But she's basically a
24 good person.

25 But I knew that the minute there was no longer any

2/98M

P E N G A D C O B A Y O N N E N J 0 7 0 0 2 F O R M F E E

be

124

1 contact, she would talk about this. She would have to. She
2 couldn't help it. It was, it was a part of her psyche. So,
3 I had put myself at risk, sir. I was not trying to buy her
4 silence or get Vernon Jordan to buy her silence. I thought
5 she was a good person. She had not been involved with me for
6 a long time in any improper way, several months, and I wanted
7 to help her get on with her life. It's just as simple as
8 that.

9 MR. WISENBERG: It's time for a break.

10 MR. KENDALL: Okay. 4:49.

11 (Whereupon, the proceedings were recessed from 4:49 p.m.
12 until 5:05 p.m.)

13 MR. KENDALL: Bob, we are at 2 hours and 55
14 minutes.

15 MR. BITTMAN: Two hours and 55 minutes, thank you.

16 BY MR. BITTMAN:

17 Q Mr. President.

18 A Mr. Bittman.

19 Q Apparently we have one hour and five minutes left,
20 if we stick to the four-hour timeframe.

21 MR. KENDALL: Plus 30 seconds.

22 MR. BITTMAN: And 30 seconds, that's right.

23 THE WITNESS: You gave me my 30 seconds' soliloquy.
24 So, I owe you 30 seconds.
25

be

125

1 BY MR. BITTMAN:

2 Q You are very generous. That actually segues very
3 nicely into one of the grand juror's asked, pointed out
4 actually, that you indicated at the beginning of the
5 deposition that you would, you would answer all the grand
6 jurors, you wanted to answer all the grand jurors' questions.
7 And they wanted to know whether you would be willing to stay
8 beyond the four-hour period to, in fact, answer all their
9 questions.

10 A Well, let's see how we do in the next hour, and
11 then we'll decide.

12 Q Okay. Let me draw your attention to early January
13 of this year, after Christmas, before your deposition. Do
14 you remember talking to Betty Currie about Monica, who had
15 just called her and said that she, Monica, needed to talk to
16 you before she signed something?

17 A I'm not sure that I do remember that. But, go
18 ahead.

19 Q This is in early January. And then Betty Currie
20 relayed this to you that Monica called, it's important, she
21 needs to talk to you before she signs something. And then
22 you do, indeed, talk to Monica that day on the telephone.

23 A I did talk to her that day?

24 Q Yes.

25 MR. KENDALL: Mr. President, excuse me. That's a

be

126

1 question. If you have a memory of that, you can answer.

2 THE WITNESS: I'm trying to remember when the last
3 time I talked to her was. I am aware, sir, that she signed
4 this affidavit about this time, sometime in the first week in
5 January. I may have talked to her before she did it. I
6 don't know. I talked to her a number of times between the
7 time Betty's brother died and Christmas. Then I saw her on
8 December 28. I may have talked to her, but I don't remember
9 the specific conversation.

10 BY MR. BITTMAN:

11 Q And you would have talked about the -- she had just
12 given you a gift actually in early January, a book on the
13 Presidents of the United States. And you discussed this with
14 her and she said that you said you liked it a lot.

15 A I did like it a lot. I told you that. My
16 impression, my belief was that she gave me that book for
17 Christmas. Maybe that's not right. I think she had that
18 book delivered to me for Christmas. And then, as I remember,
19 I went to Bosnia and for some reason she wasn't there around
20 Christmas time.

21 But, anyway, maybe I didn't get it until January.
22 My recollection was that I had gotten it right before
23 Christmas.

24 Q Let me see if I can jog your memory further.
25 Monica talked to you in that phone conversation that told you

be

127

1 that she had just met with her attorney that Mr. Jordan
2 arranged with her, and the attorney said that if she is
3 deposed that they were going to ask her how she got her job
4 at the Pentagon. And Monica then asked you, what do you
5 think I should say, how do I answer that question, how did I
6 get the job at the Pentagon. Did you talk to Monica about
7 that, about possibilities --

8 A I don't believe -- no. I don't remember her asking
9 me that. But if she, if she had asked me that, I would have
10 told her to tell the truth. I -- and I didn't, you know, I
11 don't know exactly how she got her job at the Pentagon. I
12 know Evelyn Lieberman wanted to transfer her out of the job
13 she had, and somebody must have arranged that. But I didn't
14 arrange it.

15 Q Now, that's actually not my question. My question
16 is whether you remember talking to Monica about her being
17 concerned that, I may have to answer some questions about how
18 and why I was transferred to the Pentagon out of the White
19 House, fearing that this would --

20 A No, I don't remember that at all.

21 Q -- lead to questions, or answers that would reveal
22 your relationship?

23 A Oh, no, sir. I don't remember that. Maybe
24 somebody -- maybe she did. But I only remember -- well, I
25 don't remember that. That's all I can tell you. I don't

128

1 remember that.

2 Q Are you saying, Mr. President, that you did not
3 then say to Ms. Lewinsky that you could always say that
4 people in Legislative Affairs got you the job, or helped you
5 get it?

6 A I have no recollection of that whatever.

7 Q Are you saying you didn't say it?

8 A No, sir. I'm telling you, I want to say I don't
9 recall -- I don't have any memory of this as I sit here
10 today. And I can tell you this, I never asked her to lie. I
11 never did. And I don't have any recollection of the specific
12 thing you are saying to me.

13 Now, if I could back up, there were several times
14 when Monica Lewinsky talked to me on the telephone in 1996,
15 in person in 1997, about her being concerned about what
16 anybody would say about her transfer from the White House to
17 the Pentagon. But I remember no conversation in which she
18 was concerned about it for the reasons you just mentioned.

19 And all my memory is, she was worried about it
20 because she thought it would keep her from getting a good job
21 down the road, and she talked to me about it constantly in
22 1997. She thought, well, I'll never have my record clear
23 unless I work somewhere in the White House complex where I
24 can get a good recommendation. But in the context that you
25 mention it, I do not recall a conversation.

be

1 Q Did you ever tell Ms. Lewinsky, or promise to her
2 that you would do your best to get her back into the White
3 House after the 1996 Presidential elections?

4 A What I told Ms. Lewinsky was that I would, I would
5 do what I could to see, if she had a good record at the
6 Pentagon, and she assured me she was doing a good job and
7 working hard, that I would do my best to see that the fact
8 that she had been sent away from the Legislative Affairs
9 section did not keep her from getting a job in the White
10 House, and that is, in fact, what I tried to do. I had a
11 conversation with Ms. Scott about it, and I tried to do that.

12 But I did not tell her I would order someone to
13 hire her, and I never did, and I wouldn't do that. It
14 wouldn't be right.

15 Q When you received the book, this gift from Monica,
16 the Presidents of the United States, this book that you liked
17 and you talked with Monica about, did it come with a note?
18 Do you remember the note that it came with, Mr. President?

19 A No, sir, I don't.

20 Q Do you remember that in the note she wrote that,
21 she expressed how much she missed you and how much she cared
22 for you, and you and she later talked about this in this
23 telephone conversation, and you said -- and she apologized
24 for putting such emotional, romantic things in this note, and
25 you said, yeah, you shouldn't have written some of those

2/98M

U
S
S
E
C
O
N
F
I
D
E
N
T
I
A
L

be

130

1 things, you shouldn't put those things down on paper? Did
2 you ever say anything like that to Ms. Lewinsky?

3 A Oh, I believe I did say something like that to Ms.
4 Lewinsky. I don't remember doing something as late as you
5 suggest. I'm not saying I didn't. I have no recollection of
6 that.

7 Keep in mind now, it had been quite a long time
8 since I had had any improper contact with her. And she was,
9 in a funny way, almost more attached to me than she had been
10 before. In '96, she had a long relationship, she said, with
11 a man whom she liked a lot. And I didn't know what else was
12 going on in her private life in '97. But she talked to me
13 occasionally about people she was going out with.

14 But normally her language at this point was, if
15 affectionate, was, was not improperly affectionate, I would
16 say. So -- but, it could have happened. I wouldn't say it
17 didn't. I just don't remember it at this late date.

18 Q Let me refer back to one of the subjects we talked
19 about at one of the earlier breaks, right before one of the
20 earlier breaks, and that is your meeting with Mrs. Currie on
21 January 18th. This is the Sunday after your deposition in
22 the Paula Jones case.

23 You said that you spoke to her in an attempt to
24 refresh your own recollection about the events involving
25 Monica Lewinsky, is that right?

be

131

1 A Yes.

2 Q How did you making the statement, I was never alone
3 with her, right, refresh your recollection?

4 A Well, first of all, let's remember the context
5 here. I did not at that time know of your involvement in
6 this case. I just knew that obviously someone had given them
7 a lot of information, some of which struck me as accurate,
8 some of which struck me as dead wrong. But it led them to
9 write, ask me a whole series of questions about Monica
10 Lewinsky.

11 Then on Sunday morning, this Drudge report came
12 out, which used Betty's name, and I thought that we were
13 going to be deluged by press comments. And I was trying to
14 refresh my memory about what the facts were.

15 So, when I said, we were never alone, right, I
16 think I also asked her a number of other questions, because
17 there were several times, as I'm sure she would acknowledge,
18 when I either asked her to be around. I remember once in
19 particular when I was talking with Ms. Lewinsky when I asked
20 Betty to be in the, actually, in the next room in the dining
21 room, and, as I testified earlier, once in her own office.

22 But I meant that she was always in the Oval Office
23 complex, in that complex, while Monica was there. And I
24 believe that this was part of a series of questions I asked
25 her to try to quickly refresh my memory. So, I wasn't trying

2/98M

P E R F O R M E D
C O C K P I N
B A K O N N E
0 7 0 0 0
F O R M E D

be

132

1 to get her to say something that wasn't so. And, in fact, I
2 think she would recall that I told her to just relax, go in
3 the grand jury and tell the truth when she had been called as
4 a witness.

5 Q So, when you said to Mrs. Currie that, I was never
6 alone with her, right, you just meant that you and Ms.
7 Lewinsky would be somewhere perhaps in the Oval Office or
8 many times in your back study, is that correct?

9 A That's right. We were in the back study.

10 Q And then --

11 A Keep in mind, sir, I just want to make it -- I was
12 talking about 1997. I was never, ever trying to get Betty
13 Currie to claim that on the occasions when Monica Lewinsky
14 was there when she wasn't anywhere around, that she was. I
15 would never have done that to her, and I don't think she
16 thought about that. I don't think she thought I was
17 referring to that.

18 Q Did you put a date restriction? Did you make it
19 clear to Mrs. Currie that you were only asking her whether
20 you were never alone with her after 1997?

21 A Well, I don't recall whether I did or not, but I
22 assumed -- if I didn't, I assumed she knew what I was talking
23 about, because it was the point at which Ms. Lewinsky was out
24 of the White House and had to have someone WAVE her in, in
25 order to get in the White House. And I do not believe to

2/98M

P E N N S Y L V A N I A
C O U R T S
B A Y O N N E
N J 0 7 0 0 2
F O R M
F E E D

be

1 this day that I was -- in 1997, that she was ever there and
2 that I ever saw her unless Betty Currie was there. I don't
3 believe she was.

4 Q Do you agree with me that the statement, "I was
5 never alone with her", is incorrect? You were alone with
6 Monica Lewinsky, weren't you?

7 A Well, again, it depends on how you define alone.
8 Yes, we were alone from time to time, even during 1997, even
9 when there was absolutely no improper contact occurring.
10 Yes, that is accurate.

11 But there were also a lot of times when, even
12 though no one could see us, the doors were open to the halls,
13 on both ends of the halls, people could hear. The Navy
14 stewards could come in and out at will, if they were around.
15 Other things could be happening. So, there were a lot of
16 times when we were alone, but I never really thought we were.

17 And sometimes when we, when -- but, as far as I
18 know, what I was trying to determine, if I might, is that
19 Betty was always around, and I believe she was always around
20 where I could basically call her or get her if I needed her.

21 Q When you said to Mrs. Currie, you could see and
22 hear everything, that wasn't true either, was it, as far as
23 you knew? You've already --

24 A My memory of that --

25 Q -- testified that Betty was not there.

2/98M

P
B
A
Y
O
N
N
E
J
0
7
0
0
N
F
O
R
M
E
D

be

1 A My memory of that was that, that she had the
2 ability to hear what was going on if she came in the Oval
3 Office from her office. And a lot of times, you know, when I
4 was in the Oval Office, she just had the door open to her
5 office. Then there was -- the door was never completely
6 closed to the hall. So, I think there was -- I'm not
7 entirely sure what I meant by that, but I could have meant
8 that she generally would be able to hear conversations, even
9 if she couldn't see them. And I think that's what I meant.

10 Now, I could have been referring not generally to
11 every time she was there, but one, one particular time I
12 remember when Ms. Lewinsky was there when I asked Betty --
13 and I'm sorry to say for reasons I don't entirely remember --
14 to actually stay in the dining room while I talked with
15 Monica. I do remember one such instance.

16 Q Well, you've already testified that this -- you did
17 almost everything you could to keep this relationship secret.
18 So, would it be fair to say -- even from Mrs. Currie. She
19 didn't know about the nature, that is, your intimate,
20 physically intimate relationship with Ms. Lewinsky, did she?

21 A As far as I know, she is unaware of what happened
22 on the, on the occasions when I saw her in 1996 when
23 something improper happened. And she was unaware of the one
24 time that I recall in 1997 when something happened.

25 I think she was quite well aware that I was

2/98M

P
E
D
A
G
O
G
I
C
A
N
N
O
T
F
O
R
M

be

1 determined to impose the appropriate limits on the
2 relationship when I was trying to do it. And the -- you
3 know, anybody would hope that this wouldn't become public.
4 Although I frankly, from 1996 on, always felt that if I
5 severed inappropriate contact with Ms. Lewinsky, sooner or
6 later it would get public. And I never thought it would be
7 part of the Jones case. I never even thought about that. I
8 never thought -- I certainly never thought it would be part
9 of your responsibilities.

10 Q My question was --

11 A But I did believe that she would talk about it.

12 Q My question was more simple than that. Mrs. Currie
13 did not know of the physically intimate nature of your
14 relationship, did she?

15 A I don't believe she did, no.

16 Q Okay. So, you would have done -- you tried to keep
17 that nature of the relationship from Mrs. Currie?

18 A Absolutely. I --

19 Q So, you would not have engaged in those physically
20 intimate acts if you knew that Mrs. Currie could see or hear
21 that, is that correct?

22 A That's correct. But, keep in mind, sir, I was
23 talking about 1997. That occurred, to the -- and I believe
24 that occurred only once in February of 1997. I stopped it.
25 I never should have started it, and I certainly shouldn't

2/98M

P
A
G
E
O
F
B
A
Y
O
N
N
E
J
0
7
0
0
2
F
O
R
M
F
E
E
D

1 have started it back after I resolved not to in 1996. And I
2 was referring to 1997.

3 And I -- what -- as I say, I do not know -- her
4 memory and mine may be somewhat different. I do not know
5 whether I was asking her about a particular time when Monica
6 was upset and I asked her to stand, stay back in the dining
7 area. Or whether I was, had reference to the fact that if
8 she kept the door open to the Oval Office, because it was
9 always -- the door to the hallway was always somewhat open,
10 that she would always be able to hear something if anything
11 went on that was, you know, too loud, or whatever.

12 I do not know what I meant. I'm just trying to
13 reconcile the two statements as best I can, without being
14 sure.

15 Q There was at least one event where Mrs. Currie was
16 definitely not even in the Oval Office area, isn't that
17 right? And I think you began to testify about that before.
18 That was at the radio address.

19 A I'm not sure of that. But in that case, there was,
20 there was certainly someone else there. I don't know --

21 Q Well, why would you be testing Mrs. Currie's memory
22 about whether someone else was there?

23 A Well, I can say this. If I'm in the Oval Office --
24 my belief is that there was someone else there, somewhere in
25 the Oval Office complex. I've looked at our -- I've looked

be

137

1 at the film. This, this night has become legendary now, you
2 know. I've looked at the, I've looked at the film we have.
3 I've looked at my schedules. I've seen the people that were
4 at the radio address.

5 I do believe that I was alone with her from 15 to
6 20 minutes. I do believe that things happened then which
7 were inappropriate. I don't remember whether Betty was there
8 or not, but I can't imagine that, since all this happened
9 more or less continuously in that time period, there must
10 have been someone who was working around the radio address
11 who stayed around somewhere. That would be my guess. I
12 don't know. I'm sorry. I don't have records about who it
13 would be. But I doubt very seriously if we were all alone in
14 that Oval Office complex then.

15 Q Mr. President, if there is a semen stain belonging
16 to you on a dress of Ms. Lewinsky's, how would you explain
17 that?

18 A Well, Mr. Bittman, I, I don't -- first of all, when
19 you asked me for a blood test, I gave you one promptly. You
20 came over here and got it. That's -- we met that night and
21 talked. So, that's a question you already know the answer
22 to. Not if, but you know whether.

23 And the main thing I can tell you is that doesn't
24 affect the opening statement I made. The opening statement I
25 made is that I had inappropriate intimate contact. I take

2/98M

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

be

138

1 full responsibility for it. It wasn't her fault, it was
2 mine. I do not believe that I violated the definition of
3 sexual relations I was given by directly touching those parts
4 of her body with the intent to arouse or gratify. And that's
5 all I have to say.

6 I think, for the rest, you know, you know what the
7 evidence is and it doesn't affect that statement.

8 Q Is it possible or impossible that your semen is on
9 a dress belonging to Ms. Lewinsky?

10 A I have nothing to add to my statement about it,
11 sir. You, you know whether -- you know what the facts are.
12 There's no point in a hypothetical.

13 Q Don't you know what the facts are also, Mr.
14 President?

15 A I have nothing to add to my statement, sir.

16 Q Getting back to the conversation you had with Mrs.
17 Currie on January 18th, you told her -- if she testified that
18 you told her, Monica came on to me and I never touched her,
19 you did, in fact, of course, touch Ms. Lewinsky, isn't that
20 right, in a physically intimate way?

21 A Now, I've testified about that. And that's one of
22 those questions that I believe is answered by the statement
23 that I made.

24 Q What was your purpose in making these statements to
25 Mrs. Currie, if they weren't for the purpose to try to

be

139

1 suggest to her what she should say if ever asked?

2 A Now, Mr. Bittman, I told you, the only thing I
3 remember is when all this stuff blew up, I was trying to
4 figure out what the facts were. I was trying to remember. I
5 was trying to remember every time I had seen Ms. Lewinsky.
6 Once this thing was in Drudge, and there was this argument
7 about whether it was or was not going to be in Newsweek, that
8 was a clear signal to me, because Newsweek, frankly, was --
9 had become almost a sponsoring media outlook for the Paula
10 Jones case, and had a journalist who had been trying, so far
11 fruitlessly, to find me in some sort of wrongdoing.

12 And so I knew this was all going to come out. I
13 was trying -- I did not know at the time -- I will say again,
14 I did not know that any of you were involved. I did not know
15 that the Office of Independent Counsel was involved. And I
16 was trying to get the facts and try to think of the best
17 defense we could construct in the face of what I thought was
18 going to be a media onslaught.

19 Once you became involved, I told Betty Currie not
20 to worry, that, that she had been through a terrible time.
21 She had lost her brother. She had lost her sister. Her
22 mother was in the hospital. I said, Betty, just don't worry
23 about me. Just relax, go in there and tell the truth.
24 You'll be fine. Now, that's all there was in this context.

25 Q Did the conversations that you had with Mrs.

be

140

1 Currie, this conversation, did it refresh your recollection
2 as to events involving Ms. Lewinsky?

3 A Well, as I remember, I do believe, in fairness,
4 that, you know, she may have felt some ambivalence about how
5 to react, because there were some times when she seemed to
6 say yes, when I'm not sure she meant yes. There was a time
7 -- it seems like there was one or two things where she said,
8 well, remember this, that or the other thing, which did
9 reflect my recollection.

10 So, I would say a little yes, and a little no.

11 Q Why was it then that two or three days later, given
12 that The Washington Post article came out on January 21st,
13 why would you have had another conversation with Betty Currie
14 asking or making the exact same statements to her?

15 A I don't know that I did. I remember having this
16 one time. I was, I was -- I don't know that I did.

17 Q If Mrs. Currie says you did, are you disputing
18 that?

19 A No, sir, I'm not disputing --

20 MR. KENDALL: Excuse me. Is your representation
21 that she testified that that conversation was -- when?

22 MR. BITTMAN: I'm not making a representation as to
23 what Mrs. Currie said. I'm asking the President if Mrs.
24 Currie testified two or three days later, that two or three
25 days after the conversation with the President on January

be

1 18th, that he called her into the Oval Office and went over
2 the exact same statements that the President made to her on
3 the 18th.

4 BY MR. BITTMAN:

5 Q Is that accurate? Is that a truthful statement by
6 Mrs. Currie, if she made it?

7 A I do not remember how many times I talked to Betty
8 Currie or when. I don't. I can't possibly remember that. I
9 do remember, when I first heard about this story breaking,
10 trying to ascertain what the facts were, trying to ascertain
11 what Betty's perception was. I remember that I was highly
12 agitated, understandably, I think.

13 And then I remember when I knew she was going to
14 have to testify to the grand jury, and I, I felt terrible
15 because she had been through this loss of her sister, this
16 horrible accident Christmas that killed her brother, and her
17 mother was in the hospital. I was trying to do -- to make
18 her understand that I didn't want her to, to be untruthful to
19 the grand jury. And if her memory was different from mine,
20 it was fine, just go in there and tell them what she thought.
21 So, that's all I remember.

22 BY MR. BENNETT:

23 Q Mr. President, my name is Jackie Bennett. If I
24 understand your current line of testimony, you are saying
25 that your only interest in speaking with Ms. Currie in the

2086M

P E N N S Y L V A N I A
S E P 11 1964
F O R E F E E D

be

1 days after your deposition was to refresh your own
2 recollection?

3 A Yes.

4 Q It was not to impart instructions on how she was to
5 recall things in the future?

6 A No, and certainly not under oath. That -- every
7 day, Mr. Bennett, in the White House and in every other
8 political organization when you are subject to a barrage of
9 press questions of any kind, you always try to make the best
10 case you can consistent with the facts; that is, while being
11 truthful.

12 But -- so, I was concerned for a day or two there
13 about this as a press story only. I had no idea you were
14 involved in it for a couple of days.

15 I think Betty Currie's testimony will be that I
16 gave her explicit instructions or encouragement to just go in
17 the grand jury and tell the truth. That's what I told her to
18 do and I thought she would.

19 Q Mr. President, when did you learn about the Drudge
20 Report reporting allegations of you having a sexual
21 relationship with someone at the White House?

22 A I believe it was the morning of the 18th, I think.

23 Q What time of day, sir?

24 A I have no idea.

25 Q Early morning hours?

2/98M

AMERICAN OVERSIGHT

be

1 about as soon as I could, after I finished with Prime
2 Minister Netanyahu, and in the aftermath of that meeting
3 planning where we were going next in the Middle East peace
4 process.

5 MR. KENDALL: Can we take a two-minute break,
6 please?

7 MR. BITTMAN: May I ask one other question first,
8 Mr. Kendall?

9 MR. KENDALL: Certainly. I think the witness is
10 confused on dates. That's all.

11 MR. BITTMAN: Okay.

12 THE WITNESS: That's what -- I didn't think it was
13 the night of the 17th.

14 MR. KENDALL: Mr. President, I think we'll do it in
15 a break.

16 THE WITNESS: Can we have a break and I could get
17 straightened out?

18 MR. BITTMAN: Sure. May I ask one other quick --
19 this is a question I forgot to ask from the grand jurors.

20 THE WITNESS: I don't want to get mixed up on these
21 dates now. Go ahead.

22 BY MR. BITTMAN:

23 Q This is -- they wanted to know whether, they want
24 us to clarify that the President's knowledge, your knowledge,
25 Mr. President, as to the approach to our office this morning;

2/98M

PENGAD
CO
BAYONNE
NJ
07002
FORM
FED

be

145

1 that is, we were told that you would give a general statement
2 about the nature of your relationship with Ms. Lewinsky,
3 which you have done. Yet that you would -- you did not want
4 to go in any of the details about the relationship. And that
5 if we pressed on going into the details, that you would
6 object to going into the details.

7 And the grand jurors, before they wanted, they
8 wanted to vote on some other matters, they wanted to know
9 whether you were aware of that? That we were told that?

10 MR. KENDALL: Well, Mr. Bittman, who told you that?
11 This is, this is, this is not a fair question, when you say
12 you were told. Who told you?

13 MR. BITTMAN: Who told me what, the question?

14 MR. KENDALL: You said, you said the grand jury was
15 told.

16 MR. BITTMAN: We have kept the grand jury informed,
17 as we normally would, of the proceedings here.

18 MR. KENDALL: Right. And, I'm sorry. Who, who are
19 you representing told you or the grand jurors anything? Is
20 that, is that our conversation?

21 MR. BITTMAN: Yes.

22 MR. STARR: Yes, our conversation.

23 MR. BITTMAN: Yes. That was in substance related
24 to the grand jurors.

25 THE WITNESS: And what's your question to me, Mr.

2/98M

P E N A L T Y C O D E 0 7 0 0 0 N O N F O R M E D

be

1 Bittman?

2 BY MR. BITTMAN:

3 Q Whether you were aware of the facts that I just
4 described?

5 A Yes, sir. Let me say this. I knew that Mr.
6 Kendall was going to talk with Judge Starr. What we wanted
7 to do was to be as helpful as we could to you on the question
8 of whether you felt I was being truthful, when I said I did
9 not have sexual relations with Ms. Lewinsky, as defined in
10 that definition (1) in this, in my testimony.

11 And I thought the best way to do that, and still
12 preserve some measure of privacy and dignity, would be to
13 invite all of you and the grand jurors to ask, well, would
14 you consider this, that, or the other thing covered by the
15 definition. You asked me several questions there, and I did
16 my best to answer whether I thought they were covered by the
17 definition, and said if I thought they were covered, you
18 could conclude from that that my testimony is I did not do
19 them.

20 If those things, if things are not covered by the
21 definition, and I don't believe they are covered, then I
22 could not -- then they shouldn't be within this discussion
23 one way or the other.

24 Now, I know this is somewhat unusual. But I would
25 say to the grand jury, put yourself in my position. This is

2/98M

P
B
A
Y
O
N
N
E
J
0
7
0
0
0
2
F
O
R
M
F
E
D

be

1 not a typical grand jury testimony. I, I have to assume a
2 report is going to Congress. There's a videotape being made
3 of this, allegedly because only one member of the grand jury
4 is absent. This is highly unusual. And, in addition to
5 that, I have sustained a breathtaking number of leaks of
6 grand jury proceedings.

7 And, so, I think I am right to answer all the
8 questions about perjury, but not to say things which will be
9 forever in the historic annals of the United States because
10 of this unprecedented videotape and may be leaked at any
11 time. I just think it's a mistake.

12 And, so, I'm doing my best to cooperate with the
13 grand jury and still protect myself, my family, and my
14 office.

15 MR. BITTMAN: Thank you.

16 MR. KENDALL: This will be two minutes.

17 (Whereupon, the proceedings were recessed from 5:37 p.m.
18 until 5:43 p.m.)

19 BY MR. BENNETT:

20 Q Mr. President, before we broke, we were talking
21 about the sequencing of your conversations with Betty Currie
22 following your deposition on Saturday, January 17th. Do you
23 recall that?

24 A I do.

25 Q All right. And you recall contacting Betty Currie,

2/98M

AMERICAN BAR ASSOCIATION
FEDERAL

be

1 calling her and instructing her on the evening of Saturday
2 night, after your deposition, and telling her to come in the
3 next day?

4 A Yes, sir, I do.

5 Q Sunday was normally her day off, isn't that so?

6 A Yes, it was.

7 Q And so you were making special arrangements for her
8 to come back into the White House, isn't that so?

9 A Well, yes. I asked her to come back in and talk to
10 me.

11 Q And it was at that time that you spoke with her,
12 and Mr. Bittman and Mr. Wisenberg have asked you questions
13 bout what you said in that conversation, isn't that so?

14 A Yes, they have -- I don't know whether that's the
15 time, but they -- I did talk to her as soon as I realized
16 that the deposition had become more about Monica Lewinsky
17 than Paula Jones. I asked her, you know, if she knew
18 anything about this. I said, you know, it's obvious that
19 this is going to be a matter of press speculation, and I was
20 trying to go through the litany of what had happened between
21 us, and asked some questions.

22 Q On fairness, it would be more than a matter of
23 simple press speculation, isn't that so? Mr. President,
24 there was a question about whether you had testified fully,
25 completely, and honestly on the preceding day in your

2/98M

RECEIVED
COPIES
BAYONNE
NJ
07002
FORM
FED

be

149

1 deposition.

2 A Well, actually, Mr. Bennett, I didn't think about
3 that then. I -- this has been a rather unprecedented
4 development, and I wasn't even thinking about the Independent
5 Counsel getting into this. So, at that moment, I knew
6 nothing about it and I was more interested in what the facts
7 were and whether Ms. Currie knew anything about it, knew
8 anything about what Monica Lewinsky knew about it.

9 Q Mr. President, you've told us at least a little bit
10 about your understanding of how the term sexual relations was
11 used, and what you understood it to mean in the context of
12 your deposition. Isn't that correct?

13 A That is correct.

14 Q And you've told us -- I mean, that was a lawsuit
15 Paula Jones filed in which she alleged that you asked her to
16 perform oral sex, isn't that so?

17 A That was her allegation.

18 Q That was her allegation. And, notwithstanding that
19 that was her allegation, you've testified that you understood
20 the term sexual relations, in the context of the questions
21 you were being asked, to mean something else, at least
22 insofar as you were the recipient rather than the performer?

23 A Sir, Paula Jones' lawyers pulled out that
24 definition, not me. And Judge Susan Webber Wright ruled on
25 it, just as she later ruled their case had no merit in the

be

150

1 first place, no legal merit, and dismissed it.

2 I had nothing to do with the definition. I had
3 nothing to do with the Judge's rulings. I was simply there
4 answering the questions they put to me, under the terms of
5 reference they imposed.

6 Q Well, the grand jury would like to know, Mr.
7 President, why it is that you think that oral sex performed
8 on you does not fall within the definition of sexual
9 relations as used in your deposition.

10 A Because that is -- if the deponent is the person
11 who has oral sex performed on him, then the contact is with
12 -- not with anything on that list, but with the lips of
13 another person. It seems to be self-evident that that's what
14 it is. And I thought it was curious.

15 Let me remind you, sir, I read this carefully. And
16 I thought about it. I thought about what "contact" meant. I
17 thought about what "intent to arouse or gratify" meant.

18 And I had to admit under this definition that I'd
19 actually had sexual relations with Gennifer Flowers. Now, I
20 would rather have taken a whipping than done that, after all
21 the trouble I'd been through with Gennifer Flowers, and the
22 money I knew that she had made for the story she told about
23 this alleged 12-year affair, which we had done a great deal
24 to disprove.

25 So, I didn't like any of this. But I had done my

be

151

1 best to deal with it and the -- that's what I thought. And I
2 think that's what most people would think, reading that.

3 Q Would you have been prepared, if asked by the Jones
4 lawyers, would you have been prepared to answer a question
5 directly asked about oral sex performed on you by Monica
6 Lewinsky?

7 A If the Judge had required me to answer it, of
8 course, I would have answered it. And I would have answered
9 it truthfully, if I --

10 Q By the way, do you believe that the --

11 A -- had been required.

12 Q -- Jones litigants had the same understanding of
13 sexual relations that you claim you have?

14 A I don't know what their understanding was, sir. My
15 belief is that they thought they'd get this whole thing in,
16 and that they were going to -- what they were trying to do is
17 do just what they did with Gennifer Flowers. They wanted to
18 find anything they could get from me or anyone else that was
19 negative, and then they wanted to leak it to hurt me in the
20 press, which they did even though the Judge ordered them not
21 to.

22 So, I think their --

23 Q Wouldn't it -- I'm sorry.

24 A I think their position, Mr. Bennett -- you asked
25 the question -- their position was, we're going to cast the

be

1 widest net we can and get as much embarrassing stuff as we
2 can, and then dump it out there and see if we can make him
3 bleed. I think that's what they were trying to do.

4 Q Don't you think, sir, that they could have done
5 more damage to you politically, or in whatever context, if
6 they had understood the definition in the same way you did
7 and asked the question directly?

8 A I don't know, sir. As I said, I didn't work with
9 their lawyers in preparing this case. I knew the case was
10 wrong. I knew what our evidence was. By the time of this
11 deposition, they knew what their evidence was.

12 Their whole strategy was, well, our lawsuit's not
13 good, but maybe we can hurt him with the discovery. And, you
14 know, they did some. But it didn't amount to much.

15 And did I want, if I could, to avoid talking about
16 Monica Lewinsky? Yes, I'd give anything in the world not to
17 be here talking about it. I'd be giving -- I'd give anything
18 in the world not to have to admit what I've had to admit
19 today.

20 But if you look at my answer in the Flowers [sic]
21 deposition, at least you know I tried to carefully fit all my
22 answers within the framework there, because otherwise there
23 was no reason in the wide world for me to do anything other
24 than make the statements I'd made about Gennifer Flowers
25 since 1991, that I did not have a 12-year affair with her,

2/98M

AMERICAN OVERSIGHT FOUNDATION

be

153

1 and that these, the following accusations she made are false.

2 So, that's all I can tell you. I can't prove
3 anything.

4 Q But you did have a great deal of anxiety in the
5 hours and days following the end of your deposition on the
6 17th. Isn't that fair to say?

7 A Well, I had a little anxiety the next day, of
8 course, because of the Drudge Report. And I had an anxiety
9 after the deposition because it was more about Monica
10 Lewinsky than it was about Paula Jones.

11 Q The specificity of the questions relating to Monica
12 Lewinsky alarmed you, isn't that fair to say?

13 A Yes, and it bothered me, too, that I couldn't
14 remember the answers. It bothered me that I couldn't -- as
15 Mr. Wisenberg pointed out, it bothered me that I couldn't
16 remember all the answers. I did the best I could. And so I
17 wanted to know what the deal was. Sure.

18 Q Mr. President, to your knowledge, have you turned
19 over, in response to the grand jury subpoenas, all gifts that
20 Monica Lewinsky gave you?

21 A To my knowledge, I have, sir. As you know, on
22 occasion, Mr. Kendall has asked for your help in identifying
23 those gifts. And I think there were a couple that we came
24 across in our search that were not on the list you gave us,
25 that I remembered in the course of our search had been given

be

154

1 to me by Monica Lewinsky and we gave them to you.

2 So, to the best of my knowledge, we have given you
3 everything we have.

4 Q Can you explain why, on the very day that Monica
5 Lewinsky testified in the grand jury on August 6th of this
6 year, you wore a necktie that she had given you?

7 A No, sir, I don't believe I did. What necktie was
8 it?

9 Q The necktie you wore on August 6th, sir.

10 A Well, I don't know that it was a necktie that
11 Monica Lewinsky gave me. Can you describe it to me?

12 Q Well, I don't want to take time at this point, but
13 we will provide you with photographic evidence of that, Mr.
14 President.

15 A If you give me -- I don't believe that's accurate,
16 Mr. Bennett.

17 Q So, let me ask the question --

18 A But if you give it to me, and I look at it and I
19 remember that she gave it to me, I'll be happy to produce it.
20 I do not believe that's right.

21 Q Well, if you remember that she gave it to you, why
22 haven't you produced it to the grand jury?

23 A I don't remember that she gave it to me. That's
24 why I asked you what the tie was. I have --

25 Q Can you --

be

1 A -- no earthly idea. I believe that, that I did not
2 wear a tie she gave me on August the 6th.

3 Q Can you tell us why Bayani Nelvis wore a tie that
4 Monica Lewinsky had given you on the day he appeared in the
5 grand jury?

6 A I don't know that he did.

7 Q Have you given Bayani Nelvis any ties, sir?

8 A Oh, yes, a lot of ties.

9 Q And so if he wore the tie that you gave him, that
10 Monica Lewinsky had given you, that would not have been by
11 design, is that what you are telling us?

12 A Oh, absolutely not. Let me --

13 Q You are not --

14 A May I explain, Mr. Bennett? It won't --

15 Q Yes.

16 A -- take long. Every year, since I've been
17 President, I've gotten quite a large number of ties, as you
18 might imagine. I get, I have a couple of friends, one in
19 Chicago and one in Florida who give me a lot of ties, a lot
20 of other people who send me ties all the time, or give them
21 to me when I see them.

22 So, I always have the growing number of ties in my
23 closet. What I normally do, if someone gives me a tie as a
24 gift, is I wear it a time or two. I may use it. But at the
25 end of every year, and sometimes two times a year, sometimes

be

156

1 more, I go through my tie closet and I think of all the
2 things that I won't wear a lot or that I might give away, and
3 I give them mostly to the men who work there.

4 I give them to people like Glen and Nelvis, who
5 work in the kitchen, back in the White House, or the
6 gentlemen who are my stewards or the butlers, or the people
7 who run the elevators. And I give a lot of ties away a year.
8 I'll bet I -- excluding Christmas, I bet I give 30, 40, maybe
9 more ties away a year, and then, of course, at Christmas, a
10 lot.

11 So, there would be nothing unusual if, in fact,
12 Nelvis had a tie that originally had come into my tie closet
13 from Monica Lewinsky. It wouldn't be unusual. It wouldn't
14 be by design. And there are several other people of whom
15 that is also true.

16 Q Mr. President, I'd like to move to a different area
17 right now. I'd like to ask you some questions about Kathleen
18 Willey. You met Kathleen Willey during your 1992 campaign,
19 isn't that so?

20 A Yes, sir, I did.

21 Q As a matter of fact, you first saw her at a rope
22 line at the Richmond, Virginia airport on October 13, 1992,
23 is that not correct?

24 A I don't believe that is correct.

25 Q When did you first meet her, sir?

be

1 A Well, let me ask you this. When was the debate in
2 Richmond?

3 Q I believe it was October 13, 1992, sir.

4 A Well, I believe that I had met her -- I believe I
5 had met her before then, because Governor Wilder, I believe
6 that was his last year as governor -- I think that's right,
7 92-93. I believe that I met her in connection with her
8 involvement with Governor Wilder.

9 And I have the impression -- it's kind of a vague
10 memory, but I have the impression that I had met her once
11 before, at least once before I came to that Richmond debate.
12 Now, I'm not sure of that.

13 Q Well, at least if you had met her before --

14 A But I am quite sure she was at the Richmond debate
15 and I did meet her there. I'm quite sure of that.

16 Q Mr. President, you've seen television footage of
17 you standing on a rope line with Donald Beyer, Lt. Governor
18 Donald Beyer --

19 A I have.

20 Q -- asking Mr. Beyer for the name of Kathleen
21 Willey? You've seen that footage, haven't you?

22 A I don't know that I've seen it, but I am aware that
23 it exists.

24 Q All right. And you can see him, you can read his
25 lips. He's saying the name Kathleen Willey in response to a

be

158

1 question from you, isn't that so?

2 A That's what I've heard.

3 Q And, as a matter of fact, you sent Nancy Hernreich,
4 who was present on that day, to go get her telephone number,
5 didn't you, sir?

6 A I don't believe so.

7 Q You don't believe so?

8 A Well, let me say this. If that is true, then I'm
9 quite certain that I had met her before. I would never call
10 someone out of the blue that I saw on a rope line and send
11 Nancy Hernreich to get her number to do it.

12 Q Even if you were just learning her name for the
13 first time?

14 A That's correct. I'm not so sure that I didn't ask
15 Don Beyer, if he was on the rope line with me, who she was
16 because I thought I had seen her before or I knew I had seen
17 her before and I didn't remember her name. Now, I do that
18 all the time. For men --

19 Q Mr. President --

20 A -- and women.

21 Q I'm sorry. Do you recall that you sent Nancy
22 Hernreich for her telephone number?

23 A No, I don't.

24 Q All right. Do you recall, having received her
25 telephone number, calling her that night?

2/98M

P
R
O
C
E
S
S
I
N
G
F
O
R
M
E
D

be

159

1 A No, sir, I don't.

2 Q Do you recall inviting her to meet with you at your
3 hotel that night?

4 A No, sir, I do not.

5 Q Do you recall where you stayed in Richmond,
6 Virginia during the debates you've told us about?

7 A Well, I stayed at some hotel there, I believe.

8 Q Actually, did you stay at the Williamsburg Inn, not
9 in Richmond?

10 A Yeah, that's right. We prepared in Williamsburg.
11 That's correct. I believe we prepared in Williamsburg and
12 then went to Richmond for the debate, and then I think we
13 spent the night in Richmond. And the next day, I think we
14 had a rally before we left town. I believe that's right.

15 Q Do you know of any reason Kathleen Willey's
16 telephone number would appear on your toll records from your
17 room in Williamsburg?

18 A No, there --

19 Q If you didn't call her?

20 A No, I'm not denying that I called her, sir. You
21 asked me a specific question. I won't deny that I called
22 her. I don't know whether I did or not.

23 Q As a matter of fact, you called her twice that day,
24 didn't you, sir?

25 A I don't recall. I may well have done it and I

be

160

1 don't know why I did it.

2 Q Well, does it refresh your recollection that you
3 called her and invited her to come to your room that night,
4 sir?

5 A I don't believe I did that, sir.

6 Q If Kathleen Willey has said that, she's mistaken or
7 lying, is that correct, Mr. President?

8 A I do not believe I did that. That's correct.

9 Q But what is your best recollection of that
10 conversation, those conversations?

11 A I don't remember talking to her. But I -- it seems
12 to me that at some point -- this is why I believe I had met
13 her before, too. But at some point I had some actual person-
14 to-person conversation with her about my sore throat, or what
15 she thought would be good for it, or something like that. I
16 have some vague memory of that. That's it.

17 Q Is this the chicken soup conversation, Mr.
18 President?

19 A Well, I don't know if I would -- maybe that's what
20 she said I should have. I don't remember. But I have no
21 recollection, sir, of asking her to come to my room. I --
22 and I -- I'm sorry, I don't. I can't -- I won't deny calling
23 her. I don't know if I did call her. I don't know if she
24 tried to call me first. I don't know anything about that.
25 I, I just -- I met her and Doug Wilder. I remember that she

2/98M

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

be

161

1 and her husband were active for Government Wilder, and that's
2 about all I remember, except that I had a conversation with
3 her around the Richmond debate. I do remember talking to her
4 there.

5 Q Mr. President, let's move ahead to the episode on
6 November 29, 1993, in which Mrs. Willey met you in your
7 office at the Oval, the subject matter of the "60 Minutes"
8 broadcast a few months ago. You recall that episode?

9 A I certainly do.

10 Q Mr. President, in fact, on that date you did make
11 sexual advances on Kathleen Willey, is that not correct?

12 A That's false.

13 Q You did grab her breast, as she said?

14 A I did not.

15 Q You did place your hand on her groin area, as she
16 said?

17 A No, I didn't.

18 Q And you placed her hand on your genitals, did you
19 not?

20 A Mr. Bennett, I didn't do any of that, and the
21 questions you're asking, I think, betray the bias of this
22 operation that has troubled me for a long time. You know
23 what evidence was released after the "60 Minutes" broadcast
24 that I think pretty well shattered Kathleen Willey's
25 credibility. You know what people down in Richmond said

2/98M
P
C
O
B
A
Y
O
N
N
E
J
0
7
0
0
2
F
O
R
M
E
D

be

1 about her. You know what she said about other people that
2 wasn't true. I don't know if you've made all of this
3 available to the grand jury or not.

4 She was not telling the truth. She asked for the
5 appointment with me. She asked for it repeatedly.

6 Q Did she make a sexual advance on you, Mr.
7 President?

8 A On that day, no, she did not. She was troubled.

9 Q On some other day?

10 A I wouldn't call it a sexual advance. She was
11 always very friendly. But I never took it seriously.

12 Q Mr. President, you mentioned the documents that
13 were released and information that came out from people in
14 Richmond, et cetera, after the "60 Minutes" piece was
15 broadcast. As a matter of fact, you were required, under the
16 Court's rulings, to produce those documents in response to
17 document requests by the Jones litigants, isn't that correct?

18 A No. I believe the Jones litigants' request for
19 production of documents to me ran to documents that were in
20 my personal files and in my personal possessions, and did not
21 cover documents that were White House files. So, I don't
22 believe we were required to produce them.

23 As a matter of fact, when that story first ran,
24 sir, before "60 Minutes", back in July or so of '97, I was
25 aware that we had some letters. I didn't -- I didn't

be

163

1 remember that she'd written us as much as she had and called
2 as much as she had, and asked to see me as often as she had,
3 after this alleged incident. I didn't know the volume of
4 contact that she had which undermined the story she has told.
5 But I knew there was some of it.

6 And I made a decision that I did not want to
7 release it voluntarily after the Newsweek ran the story,
8 because her friend Julie Steele was in the story saying she
9 asked her -- she, Kathleen Willey -- asked her to lie. And
10 because, frankly, her husband had committed suicide. She
11 apparently was out of money. And I thought, who knows how
12 anybody would react under that. So, I didn't.

13 But, now when "60 Minutes" came with the story and
14 everybody blew it up, I thought we would release it. But I
15 do not believe we were required to release White House
16 documents to the Jones lawyers.

17 Q Mr. President, have you made a decision on whether
18 to stay beyond the four hours we agreed to, to accept
19 questions from the grand jury?

20 MR. KENDALL: We have made an agreement, Mr.
21 Bennett, to give you four hours. We're going to do that. By
22 my watch, there are about 12 minutes left.

23 MR. BENNETT: I guess that's no. Is that correct,
24 Mr. Kendall?

25 MR. KENDALL: Yes, that's correct.

be

1 THE WITNESS: May I ask this question? Could I
2 have a two-minute break?

3 MR. BENNETT: Sure.

4 THE WITNESS: I'm sorry to bother you with this. I
5 know we're getting to the end, but I need a little break.

6 (Whereupon, the proceedings were recessed from 6:04 p.m.
7 until 6:09 p.m.)

8 BY MR. STARR:

9 Q Mr. President, at various times in this
10 investigation, officials have invoked executive privilege in
11 response to questions that have been posed to them by the
12 grand jury and in the grand jury. One of the grand jurors
13 has posed the question, did you personally authorize the
14 invocation of executive privilege?

15 A If the answer is authorized, I think the answer to
16 that would be yes. But I would like the grand jury to know
17 something.

18 In the cases where we raised the lawyer/client
19 privilege, or executive privilege, or where the Secret
20 Service raised their privilege, and when I say -- I had
21 nothing to do with that. I did not authorize it, approve it,
22 or anything else. That was something they asked to be free
23 to make their decision on by themselves.

24 In none of those cases did I actually have any
25 worry about what the people involved would say. The reason

be

1 those privileges were advanced and litigated was that I
2 believed that there was an honest difference between Judge
3 Starr and the Office of Independent Counsel, and Mr. Ruff, my
4 counsel, and I about what the proper balance was in the
5 Constitutional framework.

6 And I did not want to put the Presidency at risk of
7 being weakened as an institution, without having those
8 matters litigated. Now, we've lost some of those matters.
9 Our people have testified and the grand jury is free to
10 conclude whether they believe that the testimony they gave
11 was damaging to me. But I don't, I don't imagine it was and
12 I wasn't worried about it. It was an honest difference of
13 Constitutional principal between Judge Starr and the Office
14 of Independent Counsel and the White House.

15 Q Mr. President, a couple of very brief questions,
16 given our time. The White House's outside counsel, Mr.
17 Eggleston, withdrew the White House's appeal from Chief Judge
18 Johnson's ruling that the invocation of executive privilege
19 had to give way to the grand jury's right to the information,
20 that ruling in connection with the testimony of Mr.
21 Blumenthal and Mr. Lindsey.

22 Were you informed of that fact that the appeal had
23 been withdrawn?

24 A I was informed of it and, as a matter of fact, I
25 was consulted about it and I strongly supported it. I didn't

2/98M

P E R M A N E N T R E C O R D
B A T T O N N E
N J 0 7 0 0 2 F O R M F E E D

be

1 want to appeal it.

2 Q Okay.

3 A It was -- I had -- my main difference, Judge Starr,
4 as you know with you, is, and with some of the Court
5 decisions, is on the extent to which members of the White
6 House Counsel's staff, like Mr. Lindsey, should be able to
7 counsel the President on matters that may seem like they are
8 private, like the Jones case, but inevitably intrude on the
9 daily work of the President.

10 But I didn't really want to advance an executive
11 privilege claim in this case beyond having it litigated, so
12 that we, we had not given up on principal this matter,
13 without having some judge rule on it. So, I made --

14 Q Excuse me. And you are satisfied that you now have
15 the benefit of that ruling, is that correct?

16 A Well, yes. I just didn't want to, I didn't want to
17 -- yes. And I didn't -- I made the -- I actually, I think,
18 made the call, or at least I supported the call. I did not,
19 I strongly felt we should not appeal your victory on the
20 executive privilege issue.

21 MR. STARR: Thank you.

22 BY MR. WISENBERG:

23 Q Mr. President, among the many remaining questions
24 of the grand jurors is one that they would like answered
25 directly without relation to, without regard to inferences,

be

167

1 which is the following: Did Monica Lewinsky perform oral sex
2 on you? They would like a direct answer to that, yes or no?

3 A Well, that's not the first time that question's
4 been asked. But since I believe, and I think any person,
5 reasonable person would believe that that is not covered in
6 the definition of sexual relations I was given, I'm not going
7 to answer, except to refer to my statement.

8 I had intimate contact with her that was
9 inappropriate. I do not believe any of the contacts I had
10 with her violated the definition I was given. Therefore, I
11 believe I did not do anything but testify truthfully on these
12 matters.

13 Q We have a couple of photos of the tie that you
14 wore.

15 A Would you please give them to me?

16 Q Yes.

17 A Now, this is August 6th, is that correct?

18 Q 1998, the day that Monica Lewinsky appeared at the
19 grand jury. And my question to you on that is, were you
20 sending some kind of a signal to her by wearing --

21 A No, sir.

22 Q -- one of the ties -- let me finish, if you don't
23 mind, sir.

24 A Sure. I'm sorry. My apology.

25 Q Were you sending some kind of a signal to her by

be

1 wearing a tie she had given you on the day that she appeared
2 in front of the grand jury?

3 A No, sir. I don't believe she gave me this tie.
4 And if I was sending a signal, I'm about to send a terrible
5 signal, and maybe you ought to invite her to talk again. I
6 don't, I don't want to make light about this. I don't
7 believe she gave me this tie. I don't remember giving, her
8 giving me this tie. And I had absolutely no thought of this
9 in my mind when I wore it.

10 If she did, I, I, I, I don't remember it, and this
11 is the very first I've ever heard of it.

12 Q Did you realize when you --

13 MR. WISENBERG: Can I just have for the record,
14 what are the exhibit numbers?

15 MS. WIRTH: Yes. They should be WJC-5 and 6.

16 (Grand Jury Exhibits WJC-5
17 and WJC-6 were marked for
18 identification.)

19 MR. WISENBERG: Mr. Bennett has some more
20 questions.

21 BY MR. BENNETT:

22 Q Mr. President, we were talking about your responses
23 to document requests in the Jones litigation, and I had just
24 asked you about turning over the Kathleen Willey
25 correspondence. Do you recall that?

be

169

1 A Yes, sir, I do.

2 Q And, if I understand your testimony, you did not
3 believe that the request for documents compelled you to
4 search for those documents in the White House?

5 A Mr. Bennett, I want to answer this question in a
6 way that is completely satisfactory to you and the grand
7 jury, without violating the lawyer/client privilege, which is
8 still intact.

9 It was my understanding that in the request for
10 production of documents, that those requests ran against and
11 operated against my personal files. Now, I have some
12 personal files in the White House. And, I'm sorry. In this
13 case I'm not my own lawyer, and I don't know how the
14 distinction is made between files which are the personal
15 files of the President, and files which are White House
16 files.

17 But I do have a very clear memory that we were
18 duty-bound to search and turn over evidence or, excuse me,
19 documents that were in my personal file, but not in the White
20 House files. And I believe that the letters to which you
21 refer, Ms. Willey's letters and Ms. Willey's phone messages,
22 were in the White House files. And, therefore, I was
23 instructed at least that they were, that we had fully
24 compiled with the Jones lawyers' request, and that these
25 documents were outside the request.

208M

P E N N S Y L V A N I A
C O C K E Y C O U N T Y
J U N I O R
0 7 0 0 0 2
F O R M
F E E

be

1 Q Mr. President, you're not contending that White
2 House documents, documents stored in the fashion that these
3 were stored, are beyond your care, custody or control, are
4 you?

5 A Mr. Bennett, that may be a legal term of art that I
6 don't have the capacity to answer. I can only tell you what
7 I remember. I remember being told in no uncertain terms that
8 if these were personal files of the President, we had to
9 produce documents. If they were essentially White House
10 files, we were not bound to do so. So, we didn't.

11 Q So, you are saying somebody told you that you
12 didn't have to produce White House documents?

13 A That's --

14 MR. KENDALL: I'm going to caution the witness that
15 this question should not invade the sphere of the
16 attorney/client privilege, and any conversations with counsel
17 are privileged.

18 THE WITNESS: Let me say, and maybe, Mr. Kendall,
19 we need a break here. I'm not trying -- I'm trying to avoid
20 invading the lawyer/client privilege.

21 I can just tell you that I did, I did the best I
22 could to comply with this. And eventually we did make, of
23 course, all of this public. And it was damaging to Ms.
24 Willey and her credibility. It was terribly damaging to her.
25 And the first time she came out with this story, I didn't do

2/98M

P
B
K
O
N
N
E
N
C
O
D
E
D
F
O
R
F
I
L
E

be

171

1 it. I only did it when they went back on "60 Minutes" and
2 they made this big deal of it.

3 It turned out she had tried to sell this story and
4 make all this money. And, I must say, when I saw how many
5 letters and phone calls and messages there were that totally
6 undercut her account, I, myself, was surprised.

7 BY MR. BENNETT:

8 Q But you knew there were letters?

9 A I did, sir.

10 Q And the White House --

11 A I knew that --

12 Q -- is under your control, isn't it, Mr. President?

13 A Well, Mr. Bennett, again, I'm not trying to be --
14 some days I think it's under my control and some days I'm not
15 so sure.

16 But, if you're asking me, as a matter of law, I
17 don't want to discuss that because that's -- I mean, I'll be
18 glad to discuss it, but I'm not the person who should make
19 that decision. That decision should be made by someone who
20 can give me appropriate advice, and I don't want to violate
21 the lawyer/client privilege here.

22 Q Well, Mr. President, how are the letters from
23 Kathleen Willey that surfaced after the "60 Minutes" episode
24 aired any different from the correspondence and other
25 matters, tangible items, tangible things, of Monica Lewinsky?

be

1 A Well, the items you asked for from Monica Lewinsky
2 that I produced to you, you know that there was a tie, a
3 coffee cup, a number of other things I had. Then I told you
4 there were some things that had been in my possession that I
5 no longer had, I believe. I don't remember if I did that.
6 There was one book, I remember, that I left on vacation last
7 summer.

8 Q The same documents that the Jones litigants had
9 asked you for?

10 A Yes. But, at any rate, they were different. They
11 were in my -- the gifts were in my personal possession,
12 clearly.

13 Q In your office at the Oval?

14 A Well, in the books, now, the Presidential books
15 were with my other books that belong to me personally. They
16 were in the Oval.

17 Q Where do you draw the line, sir, between personal
18 and White House? Now, you are talking about some documents
19 that are in the Oval Office and we don't see where you are
20 drawing the line.

21 A Well, Mr. Bennett, I don't think these -- I think
22 the Lewinsky gifts were all non-documents. And you can --

23 MR. KENDALL: Is that the time?

24 THE WITNESS: Just a moment.

25 MR. KENDALL: Excuse me, Mr. Bennett.

2/98M

P E R M A N E N T R E C O R D

be

1 THE WITNESS: Well, I'd like to --

2 MR. KENDALL: You've got thirty more seconds.

3 THE WITNESS: -- finish answering the question,
4 please, because this is a legitimate question, I think.

5 There is somebody in the White House, Mr. Bennett,
6 who can answer your question, and you could call them up and
7 they could answer it, under oath, for you. There is some way
8 of desegregating what papers are personal to the President
9 and what papers are part of the White House official archives
10 papers. And I don't know how the distinction is made. I
11 just don't know.

12 BY MR. BENNETT:

13 Q Did you direct personnel, Nancy Hernreich or anyone
14 else, to make a search for correspondence from Kathleen
15 Willey and Monica Lewinsky when those documents were called
16 for in the Jones litigation, sir? Did you direct that
17 somebody on the White House staff look for those documents?

18 A I don't believe that I was in charge of doing that,
19 the document search, sir. So, the strict answer to that
20 question is that I didn't.

21 Q So, you sat back and relied on this legalistic
22 distinction between your personal, which you are in control
23 of, and the White House which, by the way, you are also in
24 control of; is that not correct?

25 MR. KENDALL: I won't object to the argumentative

2/93M

PENGAD
CO
BAYONNE
NJ
07002
FORM
FED

be

1 form of the question. We'll allow the witness to answer it.
2 We're now over time, even the 30 seconds. So, this will be
3 it.

4 THE WITNESS: Mr. Bennett, I haven't said this all
5 day long, but I would like to say it now.

6 Most of my time and energy in the last five and a
7 half years have been devoted to my job. Now, during that
8 five and a half years, I have also had to contend with things
9 no previous President has ever had to contend with: a
10 lawsuit that was dismissed for lack of legal merit, but that
11 cost me a fortune and was designed to embarrass me; this
12 independent counsel inquiry, which has gone on a very long
13 time and cost a great deal of money, and about which serious
14 questions have been raised; and a number of other things.

15 And, during this whole time, I have tried as best I
16 could to keep my mind on the job the American people gave me.
17 I did not make the legal judgment about how the documents
18 were decided upon that should be given to the Jones lawyers,
19 and ones that shouldn't.

20 And, I might add that Ms. Willey would have been
21 very happy that these papers were not turned over, because
22 they damaged her credibility so much, had they not ultimately
23 been turned over after she made, I think, the grievous error
24 of going on "60 Minutes" and saying all those things that
25 were not true.

2/98M

P
D
C
B
A
Y
O
N
N
E
J
0
7
0
0
2
F
O
R
M
F
E
E

be

1 But I did not make the decision. It was not my
2 job. This thing is being managed by other people. I was
3 trying to do my job.

4 BY MR. BENNETT:

5 Q Mr. President, the grand jury, I am notified, still
6 has unanswered questions of you, and we appeal to you again
7 to make yourself available to answer those questions.

8 MR. KENDALL: Mr. Bennett, our agreement was for
9 four hours and we have not counted the break time against
10 that, and I think that will be --

11 THE WITNESS: You know, Mr. Bennett, I wish I could
12 do it. I wish the grand jurors had been allowed to come here
13 today as we invited them to do. I wanted them down here. I
14 wanted them to be able to see me directly. I wanted them to
15 be able to ask these questions directly. But, we made an
16 agreement that was different, and I think I will go ahead and
17 stick with the terms of it.

18 BY MR. BENNETT:

19 Q The invitation was made after there was political
20 fallout over the deposition circumstances with the satellite
21 transmission and the taping. Isn't that so?

22 A I don't know about the taping, Mr. Bennett. I
23 understood that the prospect of the grand jurors coming down
24 here was raised fairly early. I don't know.

25 Q Just for the record --

be

1 A But, anyway, I wish they could have. I respect the
2 grand jury. I respect the --

3 MR. WISENBERG: Just for the record, the invitation
4 to the grand jury was contingent upon us not videotaping, and
5 we had to videotape because we have an absent grand juror.

6 MR. KENDALL: Is that the only reason, Mr.
7 Wisenberg, you have to videotape?

8 THE WITNESS: Well, yes. Do you want to answer
9 that?

10 MR. BITTMAN: Thank you, Mr. President.

11 (Whereupon, at 6:25 p.m., the proceedings were concluded.)

* * * * *

CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, Elizabeth A. Eastman, the officer before whom the foregoing proceedings were taken, do hereby certify that the witness whose testimony appears in the foregoing was duly sworn by me; that the testimony of said witness was taken by me electronically and thereafter reduced to typewriting by me; that this is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

Elizabeth A. Eastman
NOTARY PUBLIC FOR THE
DISTRICT OF COLUMBIA

My Commission Expires:
July 31, 2000

William Jefferson Clinton, 8/17/98

Videotaped Testimony before the Grand Jury

Page 2 to Page

**CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:**

**OFFICE OF THE INDEPENDENT COUNSEL
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
Phone: 202-514-8688
FAX: 202-514-8802**

Page 2

[1] OFFICE OF THE INDEPENDENT COUNSEL
 [2] TESTIMONY OF Monday, August 17, 1998
 [3] WILLIAM JEFFERSON CLINTON Washington, D. C.
 [4]
 [5] Videotaped testimony of
 [6] PRESIDENT WILLIAM JEFFERSON CLINTON
 [7] before the Independent Counsel, held at The White House,
 [8] Washington, D. C., beginning at 1:03 p.m., when were
 [9] present on behalf of the respective parties:
 [10] FOR THE INDEPENDENT COUNSEL: KENNETH N. STARR, ESQ.
 [11] Independent Counsel
 [12] JACKIE M. BENNETT, JR., ESQ.
 [13] ROBERT J. BITTMAN, ESQ.
 [14] SOLOMON L. WISENBERG, ESQ.
 [15] Deputy Independent Counsel
 [16] MICHAEL W. EDMICK, ESQ.
 [17] MARY ANNE WIRTH, ESQ.
 [18] BERNARD JAMES APPERSON, ESQ.
 [19] Associate Independent Counsel
 [20] DAVID E. KENDALL, ESQ.
 [21] FOR THE PRESIDENT:
 [22] NICOLE SELIGMAN, ESQ.
 [23] William C. Connolly
 [24] CHARLES F. C. RUFFY, ESQ.
 [25] Counsel to the President
 [26] JAMES P. RICKARDS, JR.
 [27] ALSO PRESENT:
 [28] Senior Consultant, OIC
 [29] GARY E. BRESNAHAN
 [30] White House Technical Staff
 [31] Secret Service Agent
 [32] Court Reporter: Elizabeth A. Eastman

Page 3

[1] PROCEEDINGS
 [2] MR. APPERSON: Mr. Wisenberg, the grand jury is in
 [3] session. There is a quorum. There are no unauthorized
 [4] persons in the grand jury room and they are prepared to
 [5] receive the testimony of the President.
 [6] MR. WISENBERG: Thank you, Mr. Apperson. If we
 [7] could proceed with the oath, please?
 [8] WHEREUPON,
 [9] WILLIAM JEFFERSON CLINTON
 [10] having been called for examination by the Independent
 [11] Counsel, and having been first duly sworn, was examined and
 [12] testified as follows:
 [13] EXAMINATION BY THE INDEPENDENT COUNSEL
 [14] BY MR. WISENBERG:
 [15] Q Good afternoon, Mr. President.
 [16] A Good afternoon.
 [17] Q Could you please state your full name for the
 [18] record, sir?
 [19] A William Jefferson Clinton.
 [20] Q My name is Sol Wisenberg and I'm a Deputy
 [21] Independent Counsel with the Office of Independent Counsel.
 [22] With me today are some other attorneys from the Office of
 [23] Independent Counsel.
 [24] At the courtroom are the ladies and gentlemen of
 [25] the grand jury prepared to receive your testimony as you give

Page 4

[1] it. Do you understand, sir?
 [2] A Yes, I do.
 [3] Q This proceeding is subject to Rule 6(e) of the
 [4] Federal Rules of Criminal Procedure as modified by Judge
 [5] Johnson's order. You are appearing voluntarily today as a
 [6] part of an agreement worked out between your attorney, the
 [7] Office of the Independent Counsel, and with the approval of
 [8] Judge Johnson.
 [9] Is that correct, sir?
 [10] A That is correct.
 [11] MR. KENDALL: Mr. Wisenberg, excuse me. You
 [12] referred to Judge Johnson's order. I'm not familiar with
 [13] that order. Have we been served that, or not?
 [14] MR. WISENBERG: No. My understanding is that that
 [15] is an order that the Judge is going to sign today. She
 [16] didn't have the name of a WHCA person. And basically my
 [17] understanding is that it will cover all of the attorneys here
 [18] today and the technical people in the room, so that they will
 [19] be authorized persons permitted to hear grand jury testimony
 [20] that they otherwise wouldn't be authorized to hear.
 [21] MR. KENDALL: Thank you.
 [22] BY MR. WISENBERG:
 [23] Q The grand jury, Mr. President, has been empaneled
 [24] by the United States District Court for the District of
 [25] Columbia. Do you understand that, sir?

Page 5

[1] A I do.
 [2] Q And, among other things, is currently investigating
 [3] under the authority of the Court of Appeals upon application
 [4] by the Attorney General, whether Monica Lewinsky or others
 [5] obstructed justice, intimidated witnesses, or committed other
 [6] crimes related to the case of Jones v. Clinton.
 [7] Do you understand that, sir?
 [8] A I do.
 [9] Q And today, you will be receiving questions not only
 [10] from attorneys on the OIC staff, but from some of the grand
 [11] jurors, too. Do you understand that?
 [12] A Yes, sir, I do.
 [13] Q I'm going to talk briefly about your rights and
 [14] responsibilities as a grand jury witness. Normally, grand
 [15] jury witnesses, while not allowed to have attorneys in the
 [16] grand jury room with them, can stop and consult with their
 [17] attorneys. Under our arrangement today, your attorneys are
 [18] here and present for consultation and you can break to
 [19] consult with them as necessary, but it won't count against
 [20] our total time.
 [21] Do you understand that, sir?
 [22] A I do understand that.
 [23] Q You have a privilege against self-incrimination.
 [24] If a truthful answer to any question would tend to
 [25] incriminate you, you can invoke the privilege and that

Page 6

[1] invocation will not be used against you. Do you understand
 [2] that?
 [3] A I do.
 [4] Q And if you don't invoke it, however, any answer
 [5] that you do give can and will be used against you. Do you
 [6] understand that, sir?
 [7] A I do.
 [8] Q Mr. President, you understand that your testimony
 [9] here today is under oath?
 [10] A I do.
 [11] Q And do you understand that because you have sworn
 [12] to tell the truth, the whole truth, and nothing but the
 [13] truth, that if you were to lie or intentionally mislead the
 [14] grand jury, you could be prosecuted for perjury and/or
 [15] obstruction of justice?
 [16] A I believe that's correct.
 [17] Q Is there anything that you -- I've stated to you
 [18] regarding your rights and responsibilities that you would
 [19] like me to clarify or that you don't understand?
 [20] A No, sir.
 [21] Q Mr. President, I would like to read for you a
 [22] portion of Federal Rule of Evidence 603, which discusses the
 [23] important function the oath has in our judicial system.
 [24] It says that the purpose of the oath is one,
 [25] "calculated to awaken the witness' conscience and impress the

Page 7

[1] witness' mind with the duty" to tell the truth.
 [2] Could you please tell the grand jury what that oath
 [3] means to you for today's testimony?
 [4] A I have sworn an oath to tell the grand jury the
 [5] truth, and that's what I intend to do.
 [6] Q You understand that it requires you to give the
 [7] whole truth, that is, a complete answer to each question,
 [8] sir?
 [9] A I will answer each question as accurately and fully
 [10] as I can.
 [11] Q Now, you took the same oath to tell the truth, the
 [12] whole truth, and nothing but the truth on January 17th, 1998
 [13] in a deposition in the Paula Jones litigation; is that
 [14] correct, sir?
 [15] A I did take an oath then.
 [16] Q Did the oath you took on that occasion mean the
 [17] same to you then as it does today?
 [18] A I believed then that I had to answer the questions
 [19] truthfully, that is correct.
 [20] Q I'm sorry. I didn't hear you, sir.
 [21] A I believed that I had to answer the questions
 [22] truthfully. That's correct.
 [23] Q And it meant the same to you then as it does today?
 [24] A Well, no one read me a definition then and we
 [25] didn't go through this exercise then. I swore an oath to

Page 8

[1] tell the truth, and I believed I was bound to be truthful and
 [2] I tried to be.
 [3] Q At the Paula Jones deposition, you were represented
 [4] by Mr. Robert Bennett, your counsel, is that correct?
 [5] A That is correct.
 [6] Q He was authorized by you to be your representative
 [7] there, your attorney, is that correct?
 [8] A That is correct.
 [9] Q Your counsel, Mr. Bennett, indicated at page 5 of
 [10] the deposition, lines 10 through 12, and I'm quoting, "the
 [11] President intends to give full and complete answers as Ms.
 [12] Jones is entitled to have".
 [13] My question to you is, do you agree with your
 [14] counsel that a plaintiff in a sexual harassment case is, to
 [15] use his words, entitled to have the truth?
 [16] A I believe that I was bound to give truthful
 [17] answers, yes, sir.
 [18] Q But the question is, sir, do you agree with your
 [19] counsel that a plaintiff in a sexual harassment case is
 [20] entitled to have the truth?
 [21] A I believe when a witness is under oath in a civil
 [22] case, or otherwise under oath, the witness should do
 [23] everything possible to answer the questions truthfully.
 [24] MR. WISENBERG: I'm going to turn over questioning
 [25] now to Mr. Bittman of our office, Mr. President.

Page 11

[1] That, Mr. Bittman, is my statement.
 [2] Q Thank you, Mr. President. And, with that, we would
 [3] like to take a break.
 [4] A Would you like to have this?
 [5] Q Yes, please. As a matter of fact, why don't we
 [6] have that marked as Grand Jury Exhibit WJC-1.
 [7] (Grand Jury Exhibit WJC-1 was
 [8] marked for identification.)
 [9] THE WITNESS: So, are we going to take a break?
 [10] MR. KENDALL: Yes. We will take a break. Can we
 [11] have the camera off, now, please? And it's 1:14.
 [12] (Whereupon, the proceedings were recessed from 1:14 p.m.
 [13] until 1:30 p.m.)
 [14] MR. KENDALL: 1:30, Bob.
 [15] MR. BITTMAN: It's 1:30 and we have the feed with
 [16] the grand jury.
 [17] BY MR. BITTMAN:
 [18] Q Good afternoon again, Mr. President.
 [19] A Good afternoon, Mr. Bittman.
 [20] (Discussion off the record.)
 [21] BY MR. BITTMAN:
 [22] Q Mr. President, your statement indicates that your
 [23] contacts with Ms. Lewinsky did not involve any inappropriate,
 [24] intimate contact.
 [25] MR. KENDALL: Mr. Bittman, excuse me. The

Page 9

[1] BY MR. BITTMAN:
 [2] Q Good afternoon, Mr. President.
 [3] A Good afternoon, Mr. Bittman.
 [4] Q My name is Robert Bittman. I'm an attorney with
 [5] the Office of Independent Counsel.
 [6] Mr. President, we are first going to turn to some
 [7] of the details of your relationship with Monica Lewinsky that
 [8] follow up on your deposition that you provided in the Paula
 [9] Jones case, as was referenced, on January 17th, 1998.
 [10] The questions are uncomfortable, and I apologize
 [11] for that in advance. I will try to be as brief and direct as
 [12] possible.
 [13] Mr. President, were you physically intimate with
 [14] Monica Lewinsky?
 [15] A Mr. Bittman, I think maybe I can save the -- you
 [16] and the grand jurors a lot of time if I read a statement,
 [17] which I think will make it clear what the nature of my
 [18] relationship with Ms. Lewinsky was and how it related to the
 [19] testimony I gave, what I was trying to do in that testimony.
 [20] And I think it will perhaps make it possible for you to ask
 [21] even more relevant questions from your point of view.
 [22] And, with your permission, I'd like to read that
 [23] statement.
 [24] Q Absolutely. Please, Mr. President.
 [25] A When I was alone with Ms. Lewinsky on certain

Page 12

[1] witness --
 [2] THE WITNESS: No, sir. It indicates --
 [3] MR. KENDALL: The witness does not have --
 [4] THE WITNESS: -- that it did involve inappropriate
 [5] and intimate contact.
 [6] BY MR. BITTMAN:
 [7] Q Pardon me. That it did involve inappropriate,
 [8] intimate contact.
 [9] A Yes, sir, it did.
 [10] MR. KENDALL: Mr. Bittman, the witness -- the
 [11] witness does not have a copy of the statement. We just have
 [12] the one copy.
 [13] MR. BITTMAN: If he wishes --
 [14] MR. KENDALL: Thank you.
 [15] MR. BITTMAN: -- his statement back?
 [16] BY MR. BITTMAN:
 [17] Q Was this contact with Ms. Lewinsky, Mr. President,
 [18] did it involve any sexual contact in any way, shape, or form?
 [19] A Mr. Bittman, I said in this statement I would like
 [20] to stay to the terms of the statement. I think it's clear
 [21] what inappropriately intimate is. I have said what it did
 [22] not include. I -- it did not include sexual intercourse, and
 [23] I do not believe it included conduct which falls within the
 [24] definition I was given in the Jones deposition. And I would
 [25] like to stay with that characterization.

Page 10

[1] occasions in early 1996 and once in early 1997, I engaged in
 [2] conduct that was wrong. These encounters did not consist of
 [3] sexual intercourse. They did not constitute sexual relations
 [4] as I understood that term to be defined at my January 17th,
 [5] 1998 deposition. But they did involve inappropriate intimate
 [6] contact.
 [7] These inappropriate encounters ended, at my
 [8] insistence, in early 1997. I also had occasional telephone
 [9] conversations with Ms. Lewinsky that included inappropriate
 [10] sexual banter.
 [11] I regret that what began as a friendship came to
 [12] include this conduct, and I take full responsibility for my
 [13] actions.
 [14] While I will provide the grand jury whatever other
 [15] information I can, because of privacy considerations
 [16] affecting my family, myself, and others, and in an effort to
 [17] preserve the dignity of the office I hold, this is all I will
 [18] say about the specifics of these particular matters.
 [19] I will try to answer, to the best of my ability,
 [20] other questions including questions about my relationship
 [21] with Ms. Lewinsky; questions about my understanding of the
 [22] term "sexual relations", as I understood it to be defined at
 [23] my January 17th, 1998 deposition; and questions concerning
 [24] alleged subornation of perjury, obstruction of justice, and
 [25] intimidation of witnesses.

Page 13

[1] Q Let us then move to the definition that was
 [2] provided you during your deposition. We will have that
 [3] marked as Grand Jury Exhibit WJC-2.
 [4] (Grand Jury Exhibit WJC-2 was
 [5] marked for identification.)
 [6] BY MR. BITTMAN:
 [7] Q This is an exact copy, Mr. President, of the
 [8] exhibit that was provided you during that deposition. And
 [9] I'm sure you remember from the deposition that paragraph (1)
 [10] of the definition remained in effect. Judge Wright ruled
 [11] that that was to be the guiding definition, and that
 [12] paragraphs (2) and (3) were stricken.
 [13] Do you remember that, Mr. President?
 [14] A Yes. Specifically what I remember is there were
 [15] two different discussions, I think, of this. There was quite
 [16] an extended one in the beginning, and everybody was entering
 [17] into it. And in the end, the Judge said that she would take
 [18] the first definition and strike the rest of it. That's my
 [19] memory.
 [20] Q Did you -- well, at page 19 of your deposition in
 [21] that case, the attorney who provided you with the definition
 [22] asked you, "Would you please take whatever time you need to
 [23] read this definition". And later on in the deposition, you
 [24] did, of course, refer to the definition several times.
 [25] Were you, during the deposition, familiar with the

Page 14

(1) definition?
 (2) A Yes, sir. My -- let me just ask a question. If
 (3) you are going to ask me about my deposition, could I have a
 (4) copy of it? Does anybody have a copy of it?
 (5) Q Yes. We have a copy. We'll provide you with a
 (6) copy.
 (7) MS. WIRTH: We will mark it as Grand Jury Exhibit
 (8) WJC-3.
 (9) (Grand Jury Exhibit WJC-3 was
 (10) marked for identification.)
 (11) THE WITNESS: Now, did you say that was on page 19,
 (12) Mr. Bitman?
 (13) BY MR. BITTMAN:
 (14) Q It was at page 19, Mr. President, beginning at line
 (15) 21, and I'll read it in full. This is from the Jones
 (16) attorney. "Would you please take whatever time you need to
 (17) read this definition, because when I use the term 'sexual
 (18) relations', this is what I mean today."
 (19) A All right. Yes, that starts on 19. But let me say
 (20) that there is a -- just for the record, my recollection was
 (21) accurate. There is a long discussion here between the
 (22) attorney and the Judge. It goes on until page 23. And in
 (23) the end the Judge says, "I'm talking only about part one in
 (24) the definition", and "Do you understand that?" And I answer,
 (25) "I do."

Page 15

(1) The judge says part one, and then the lawyer for
 (2) Ms. Jones says he's only talking about part one and asked me
 (3) if I understand it. And I say, I do, and that was my
 (4) understanding.
 (5) I might also note that when I was given this and
 (6) began to ask questions about it, I actually circled number
 (7) one. This is my circle here. I remember doing that so I
 (8) could focus only on those two lines, which is what I did.
 (9) Q Did you understand the words in the first portion
 (10) of the exhibit, Mr. President, that is, "For the purposes of
 (11) this deposition, a person engages in 'sexual relations' when
 (12) the person knowingly engages in or causes?"
 (13) Did you understand, do you understand the words
 (14) there in that phrase?
 (15) A Yes. My -- I can tell you what my understanding of
 (16) the definition is, if you want me to --
 (17) Q Sure.
 (18) A -- do it. My understanding of this definition is
 (19) it covers contact by the person being deposed with the
 (20) enumerated areas, if the contact is done with an intent to
 (21) arouse or gratify. That's my understanding of the
 (22) definition.
 (23) Q What did you believe the definition to include and
 (24) exclude? What kinds of activities?
 (25) A I thought the definition included any activity by

Page 16

(1) the person being deposed, where the person was the actor and
 (2) came in contact with those parts of the bodies with the
 (3) purpose or intent or gratification, and excluded any other
 (4) activity.
 (5) For example, kissing is not covered by that, I
 (6) don't think.
 (7) Q Did you understand the definition to be limited to
 (8) sexual activity?
 (9) A Yes, I understood the definition to be limited to,
 (10) to physical contact with those areas of the bodies with the
 (11) specific intent to arouse or gratify. That's what I
 (12) understood it to be.
 (13) Q What specific acts did the definition include, as
 (14) you understood the definition on January 17, 1998?
 (15) A Any contact with the areas there mentioned, sir.
 (16) If you contacted, if you contacted those parts of the body
 (17) with an intent to arouse or gratify, that is covered.
 (18) Q What did you understand --
 (19) A The person being deposed. If the person being
 (20) deposed contacted those parts of another person's body with
 (21) an intent to arouse or gratify, that was covered.
 (22) Q What did you understand the word "causes", in the
 (23) first phrase? That is, "For the purposes of this deposition,
 (24) a person engaged in 'sexual relations' when the person
 (25) knowingly causes contact?"

Page 17

(1) A I don't know what that means. It doesn't make any
 (2) sense to me in this context, because -- I think what I
 (3) thought there was, since this was some sort of -- as I
 (4) remember, they said in the previous discussion -- and I'm
 (5) only remembering now, so if I make a mistake you can correct
 (6) me. As I remember from the previous discussion, this was
 (7) some kind of definition that had something to do with sexual
 (8) harassment. So, that implies it's forcing to me, and I --
 (9) and there was never any issue of forcing in the case
 (10) involving, well, any of these questions they were asking me.
 (11) They made it clear in this discussion I just
 (12) reviewed that what they were referring to was intentional
 (13) sexual conduct, not some sort of forcible abusive behavior.
 (14) So, I basically -- I don't think I paid any
 (15) attention to it because it appeared to me that that was
 (16) something that had no reference to the facts that they
 (17) admitted they were asking me about.
 (18) Q So, if I can be clear, Mr. President, was it your
 (19) understanding back in January that the definition, now marked
 (20) as Grand Jury Exhibit 2, only included consensual sexual
 (21) activity?
 (22) A No. My understanding -- let me go back and say it.
 (23) My understanding -- I'll tell you what it did include. My
 (24) understanding was, what I was giving to you, was that what
 (25) was covered in those first two lines was any direct contact

Page 18

(1) by the person being deposed with those parts of another
 (2) person's body, if the contact was done with an intent to
 (3) arouse or gratify. That's what I believed it meant.
 (4) That's what I believed it meant then reading it.
 (5) That's what I believe it means today.
 (6) Q I'm just trying to understand, Mr. President. You
 (7) indicated that you put the definition in the context of a
 (8) sexual harassment case.
 (9) A No, no. I think it was not in the context of
 (10) sexual harassment. I just reread those four pages, which
 (11) obviously the grand jury doesn't have. But there was some
 (12) reference to the fact that this definition apparently bore
 (13) some, had some connection to some definition in another
 (14) context, and that this was being used not in that context,
 (15) not necessarily in the context of sexual harassment.
 (16) So, I would think that this "causes" would be,
 (17) would mean to force someone to do something. That's what I
 (18) read it. That's the only point I'm trying to make.
 (19) Therefore, I did not believe that anyone had ever
 (20) suggested that I had forced anyone to do anything, and that I
 (21) -- and I did not do that. And so that could not have had any
 (22) bearing on any questions related to Ms. Lewinsky.
 (23) Q I suppose, since you have now read portions of the
 (24) transcript again, that you were reminded that you did not ask
 (25) for any clarification of the terms. Is that correct? Of the

Page 19

(1) definition?
 (2) A No, sir. I thought it was a rather -- when I read
 (3) it, I thought it was a rather strange definition. But it was
 (4) the one the Judge decided on and I was bound by it. So, I
 (5) took it.
 (6) Q During the deposition, you remember that Ms.
 (7) Lewinsky's name came up and you were asked several questions
 (8) about her. Do you remember that?
 (9) A Yes, sir, I do.
 (10) Q During those -- or before those questions actually
 (11) got started, your attorney, Mr. Bennett, objected to any
 (12) questions about Ms. Lewinsky, and he represented to Judge
 (13) Wright, who was presiding -- that was unusual, wasn't it,
 (14) that a federal judge would come and actually -- in your
 (15) experience -- that a federal judge would come and preside at
 (16) a deposition?
 (17) MR. KENDALL: Mr. Bitman, excuse me. Could you
 (18) identify the transcript page upon which Mr. Bennett objected
 (19) to all testimony about Ms. Lewinsky before it got started?
 (20) MR. BITTMAN: The objection, this quote that I'm
 (21) referring to, is going to begin at page 54 of the deposition.
 (22) MR. KENDALL: That is into the testimony though,
 (23) after the testimony about Ms. Lewinsky has begun, is it not?
 (24) BY MR. BITTMAN:
 (25) Q Mr. President, is it unusual for a federal judge to

Page 20

(1) preside over a civil deposition?
 (2) A I think it is, but this was an unusual case. I
 (3) believe I know why she did it.
 (4) Q Your attorney, Mr. Bennett, objected to the
 (5) questions about Ms. Lewinsky, didn't he?
 (6) A What page is that on, sir?
 (7) Q Page 54, where he questions whether the attorneys
 (8) for Ms. Jones had a good faith basis to ask some of the
 (9) questions that they were posing to you. His objections
 (10) actually begin on page 53.
 (11) Since, as the President pointed out that the grand
 (12) jurors correctly do not have a copy of the deposition, I will
 (13) read the portion that I am referring to. And this begins at
 (14) line 1 on page 54.
 (15) "I question the good faith of counsel, the innuendo
 (16) in the question. Counsel is fully aware that Ms. Lewinsky
 (17) has filed, has an affidavit which they are in possession of
 (18) saying that there is absolutely no sex of any kind in any
 (19) manner, shape or form, with President Clinton".
 (20) A Where is that?
 (21) Q That is on page 54, Mr. President, beginning at
 (22) line 1, about midway through line 1.
 (23) A Well, actually, in the present tense that is an
 (24) accurate statement. That was an, that was an accurate
 (25) statement, if -- I don't -- I think what Mr. Bennett was

Page 21

(1) concerned about, if I -- maybe it would be helpful to you and
 (2) to the grand jurors, quite apart from these comments, if I
 (3) could tell you what his state of mind was, what my state of
 (4) mind was, and why I think the Judge was there in the first
 (5) place.
 (6) If you don't want me to do it, I won't. But I
 (7) think it will help to explain a lot of this.
 (8) Q Well, we are interested, and I know from the
 (9) questions that we've received from the grand jurors they are
 (10) interested in knowing what was going on in your mind when you
 (11) were reading Grand Jury Exhibit 2, and what you understood
 (12) that definition to include.
 (13) Our question goes to whether -- and you were
 (14) familiar, and what Mr. Bennett was referring to obviously is
 (15) Ms. Lewinsky's affidavit. And we will have that marked, Mr.
 (16) President, as Grand Jury Exhibit WJC-4.
 (17) (Grand Jury Exhibit WJC-4 was
 (18) marked for identification.)
 (19) BY MR. BITTMAN:
 (20) Q And you remember that Ms. Lewinsky's affidavit said
 (21) that she had had no sexual relationship with you. Do you
 (22) remember that?
 (23) A I do.
 (24) Q And do you remember in the deposition that Mr.
 (25) Bennett asked you about that. This is at the end of the --

Page 22

(1) towards the end of the deposition. And you indicated, he
 (2) asked you whether the statement that Ms. Lewinsky made in her
 (3) affidavit was --
 (4) A Truthful.
 (5) Q -- true. And you indicated that it was absolutely
 (6) correct.
 (7) A I did. And at the time that she made the
 (8) statement, and indeed to the present day because, as far as I
 (9) know, she was never deposed since the Judge ruled she would
 (10) not be permitted to testify in a case the Judge ruled had no
 (11) merit; that is, this case we're talking about.
 (12) I believe at the time that she filled out this
 (13) affidavit, if she believed that the definition of sexual
 (14) relationship was two people having intercourse, then this is
 (15) accurate. And I believe that is the definition that most
 (16) ordinary Americans would give it.
 (17) If you said Jane and Harry have a sexual
 (18) relationship, and you're not talking about people being drawn
 (19) into a lawsuit and being given definitions, and then a great
 (20) effort to trick them in some way, but you are just talking
 (21) about people in ordinary conversations, I'll bet the grand
 (22) jurors, if they were talking about two people they know, and
 (23) said they have a sexual relationship, they meant they were
 (24) sleeping together; they meant they were having intercourse
 (25) together.

Page 23

(1) So, I'm not at all sure that this affidavit is not
 (2) true and was not true in Ms. Lewinsky's mind at the time she
 (3) swore it out.
 (4) Q Did you talk with Ms. Lewinsky about what she meant
 (5) to write in her affidavit?
 (6) A I didn't talk to her about her definition. I did
 (7) not know what was in this affidavit before it was filled out
 (8) specifically. I did not know what words were used
 (9) specifically before it was filled out, or what meaning she
 (10) gave to them.
 (11) But I'm just telling you that it's certainly true
 (12) what she says here, that we didn't have -- there was no
 (13) employment, no benefit in exchange, there was nothing having
 (14) anything to do with sexual harassment. And if she defined
 (15) sexual relationship in the way I think most Americans do,
 (16) meaning intercourse, then she told the truth.
 (17) Q My question --
 (18) A And that depends on what was in her mind. I don't
 (19) know what was in her mind. You'll have to ask her that.
 (20) Q But you indicated before that you were aware of
 (21) what she intended by the term "sexual relationship".
 (22) A No, sir. I said I thought that this could be a
 (23) truthful affidavit. And when I read it, since that's the way
 (24) I would define it, since -- keep in mind, she was not, she
 (25) was not bound by this sexual relations definition, which is

Page 24

(1) highly unusual; I think anybody would admit that. When she
 (2) used a different term, sexual relationship, if she meant by
 (3) that what most people mean by it, then that is not an
 (4) untruthful statement.
 (5) Q So, your definition of sexual relationship is
 (6) intercourse only, is that correct?
 (7) A No, not necessarily intercourse only. But it would
 (8) include intercourse. I believe, I believe that the common
 (9) understanding of the term, if you say two people are having a
 (10) sexual relationship, most people believe that includes
 (11) intercourse. So, if that's what Ms. Lewinsky thought, then
 (12) this is a truthful affidavit. I don't know what was in her
 (13) mind. But if that's what she thought, the affidavit is true.
 (14) Q What else would sexual relationship include besides
 (15) intercourse?
 (16) A Well, that -- I think -- let me answer what I said
 (17) before. I think most people when they use that term include
 (18) sexual relationships and whatever other sexual contact is
 (19) involved in a particular relationship. But they think it
 (20) includes intercourse as well. And I would have thought so.
 (21) Before I got into this case and heard all I've heard, and
 (22) seen all I've seen, I would have thought that that's what
 (23) nearly everybody thought it meant.
 (24) Q Well, I ask, Mr. President, because your attorney,
 (25) using the very document, Grand Jury Exhibit 4, WJC-4,

Page 25

(1) represented to Judge Wright that his understanding of the
 (2) meaning of that affidavit, which you've indicated you thought
 (3) Ms. Lewinsky thought was, she was referring just to
 (4) intercourse, he says to Judge Wright that it meant absolutely
 (5) no sex of any kind in any manner, shape or form.
 (6) A Well, let me say this. I didn't have any
 (7) discussion obviously at this moment with Mr. Bennett. I'm
 (8) not even sure I paid much attention to what he was saying. I
 (9) was thinking, I was ready to get on with my testimony here
 (10) and they were having these constant discussions all through
 (11) the deposition. But that statement in the present tense, at
 (12) least, is not inaccurate, if that's what Mr. Bennett meant.
 (13) That is, at the time that he said that, and for some time
 (14) before, that would be a completely accurate statement.
 (15) Now, I don't believe that he was -- I don't know
 (16) what he meant. You'd have to talk to him, because I just
 (17) wasn't involved in this, and I didn't pay much attention to
 (18) what was being said. I was just waiting for them to get back
 (19) to me. So, I can't comment on, or be held responsible for,
 (20) whatever he said about that, I don't think.
 (21) Q Well, if you -- do you agree with me that if he
 (22) misled Judge Wright in some way that you would have
 (23) corrected the record and said, excuse me, Mr. Bennett, I
 (24) think the Judge is getting a misimpression by what you're
 (25) saying?

Page 26

[1] A Mr. Bennett was representing me. I wasn't
 [2] representing him. And I wasn't even paying much attention to
 [3] this conversation, which is why, when you started asking me
 [4] about this, I asked to see the deposition. I was focusing on
 [5] my answers to the questions. And I've told you what I
 [6] believe about this deposition, which I believe to be true.
 [7] And it's obvious, and I think by your questions you
 [8] have betrayed that the Jones lawyers' strategy in this case
 [9] had nothing to do with uncovering or proving sexual
 [10] harassment.
 [11] By the time this discovery started, they knew they
 [12] had a bad case on the law and they knew what our evidence
 [13] was. They knew they had a lousy case on the facts. And so
 [14] their strategy, since they were being funded by my political
 [15] opponents, was to have this dragnet of discovery. They
 [16] wanted to cover everybody. And they convinced the Judge,
 [17] because she gave them strict orders not to leak, that they
 [18] should be treated like other plaintiffs in other civil cases,
 [19] and how could they ever know whether there had been any
 [20] sexual harassment, unless they first knew whether there had
 [21] been any sex.
 [22] And so, with that broad mandate limited by time and
 [23] employment in the federal or state government, they proceeded
 [24] to cross the country and try to turn up whatever they could;
 [25] not because they thought it would help their case. By the

Page 27

[1] time they did this discovery, they knew what this deal was in
 [2] their case, and they knew what was going to happen. And
 [3] Judge Wright subsequently threw it out. What they —
 [4] Q With all respect, Mister —
 [5] A Now, let me finish, Mr. Bennett [sic]. I mean, you
 [6] brought this up. Excuse me, Mr. Bitman.
 [7] What they wanted to do, and what they did do, and
 [8] what they had done by the time I showed up here, was to find
 [9] any negative information they could on me, whether it was
 [10] true or not; get it in a deposition; and then leak it, even
 [11] though it was illegal to do so. It happened repeatedly. The
 [12] Judge gave them orders.
 [13] One of the reasons she was sitting in that
 [14] deposition was because she was trying to make sure that it
 [15] didn't get out of hand.
 [16] But that was their strategy, and they did a good
 [17] job of it, and they got away with it. I've been subject to
 [18] quite a lot of illegal leaking, and they had a very
 [19] determined deliberate strategy, because their real goal was
 [20] to hurt me. When they knew they couldn't win the lawsuit,
 [21] they thought, well, maybe we can pummel him. Maybe they
 [22] thought I'd settle. Maybe they just thought they would get
 [23] some political advantage out of it. But that's what was
 [24] going on here.
 [25] Now, I'm trying to be honest with you, and it hurts

Page 28

[1] me. And I'm trying to tell you the truth about what happened
 [2] between Ms. Lewinsky and me. But that does not change the
 [3] fact that the real reason they were zeroing in on anybody was
 [4] to try to get any person in there, no matter how uninvolved
 [5] with Paula Jones, no matter how uninvolved with sexual
 [6] harassment, so they could hurt me politically. That's what
 [7] was going on.
 [8] Because by then, by this time, this thing had been
 [9] going on a long time. They knew what our evidence was. They
 [10] knew what the law was in the circuit in which we were
 [11] bringing this case. And so they just thought they would take
 [12] a wrecking ball to me and see if they could do some damage.
 [13] Q Judge Wright had ruled that the attorneys in the
 [14] Jones case were permitted to ask you certain questions,
 [15] didn't she?
 [16] A She certainly did. And they asked them and I did
 [17] my best to answer them. I'm just trying to tell —
 [18] Q And was it your responsibility —
 [19] A — you what my state of mind was.
 [20] Q — to answer those questions truthfully, Mr.
 [21] President?
 [22] A It was.
 [23] Q And was —
 [24] A But it was not my responsibility, in the face of
 [25] their repeated illegal leaking, it was not my responsibility

Page 29

[1] to volunteer a lot of information. There are many cases in
 [2] this deposition where I gave — and keep in mind, I prepared,
 [3] I treated them, frankly, with respect. I prepared very well
 [4] for this deposition on the Jones matters. I prepared very
 [5] well on that. I did not know that Linda Tripp had been
 [6] involved in the preparation of this deposition, or that all
 [7] of you —
 [8] Q Do you know that now?
 [9] A No, I don't. I just know that — what I read in
 [10] the papers about it. But I had no way of knowing that they
 [11] would ask me all these detailed questions. I did the best I
 [12] could to answer them.
 [13] Q Did you prepare —
 [14] A But in this deposition, Mr. Bitman, I was doing my
 [15] best to be truthful. I was not trying to be particularly
 [16] helpful to them, and I didn't think I had an obligation to be
 [17] particularly helpful to them to further a — when I knew that
 [18] there was no evidence here of sexual harassment, and I knew
 [19] what they wanted to do was to leak this, even though it was
 [20] unlawful to do so. That's —
 [21] Q Did you believe, Mr. President —
 [22] A — what I knew.
 [23] Q — that you had an obligation to make sure that the
 [24] presiding federal judge was on board and had the correct
 [25] facts? Did you believe that was your obligation?

Page 30

[1] A Sir, I was trying to answer my testimony. I was
 [2] thinking about my testimony. I don't believe I ever even
 [3] focused on what Mr. Bennett said in the exact words he did
 [4] until I started reading this transcript carefully for this
 [5] hearing. That moment, that whole argument just passed me by.
 [6] I was a witness. I was trying to focus on what I said and
 [7] how I said it.
 [8] And, believe me, I knew what the purpose of the
 [9] deposition was. And, sure enough, by the way, it did all
 [10] leak, just like I knew it would.
 [11] Q Let me ask you, Mr. President, you indicate in your
 [12] statement that you were alone with Ms. Lewinsky. Is that
 [13] right?
 [14] A Yes, sir.
 [15] Q How many times were you alone with Ms. Lewinsky
 [16] A Let me begin with the correct answer. I don't know
 [17] for sure. But if you would like me to give an educated
 [18] guess, I will do that, but I do not know for sure. And I
 [19] will tell you what I think, based on what I remember. But I
 [20] can't be held to a specific time, because I don't have
 [21] records of all of it.
 [22] Q How many times do you think?
 [23] A Well, there are two different periods here.
 [24] There's the period when she worked in the White House until
 [25] April of '96. And then there's the period when she came back

Page 31

[1] to visit me from February '97 until late December '97.
 [2] Based on our records — let's start with the
 [3] records, where we have the best records and the closest in
 [4] time. Based on our records, between February and December,
 [5] it appears to me that at least I could have seen her
 [6] approximately nine times. Although I do not believe I saw
 [7] her quite that many times, at least it could have happened.
 [8] There were — we think there were nine or 10 times
 [9] when she was in, in the White House when I was in the Oval
 [10] Office when I could have seen her. I do not believe I saw
 [11] her that many times, but I could have.
 [12] Now, we have no records for the time when she was
 [13] an employee at the White House, because we have no records of
 [14] that for any of the employees at the White House, unless
 [15] there was some formally scheduled meeting that was on the, on
 [16] the calendar for the day.
 [17] I remember — I'll tell you what I remember. I
 [18] remember meeting her, or having my first real conversation
 [19] with her during the government shutdown in November of '95,
 [20] when she — as I explained in my deposition, during the
 [21] government shutdown, the — most federal employees were
 [22] actually prohibited from coming to work, even in the White
 [23] House. Most people in the White House couldn't come to work.
 [24] The Chief of Staff could come to work. My National Security
 [25] Advisor could come to work. I could.

Page 32

(1) Therefore, interns were assigned to all offices.
 (2) And I believe it was her last week as an intern. Anyway, she
 (3) worked in the Chief of Staff's Office. One night she brought
 (4) me some pizza. We had some remarks.
 (5) Now, the next time I remember seeing her alone was
 (6) on a couple of occasions when she was working in the
 (7) Legislative Affairs Office as a full-time employee. I
 (8) remember specifically, I have a specific recollection of two
 (9) times. I don't remember when they were, but I remember twice
 (10) when, on Sunday afternoon, she brought papers down to me,
 (11) stayed, and we were alone.
 (12) And I am frankly quite sure -- although I have no
 (13) specific memory, I am quite sure there were a couple of more
 (14) times, probably two times more, three times more. That's
 (15) what I would say. That's what I can remember. But I do not
 (16) remember when they were, or at what time of day they were, or
 (17) what the facts were. But I have a general memory that would
 (18) say I certainly saw her more than twice during that period
 (19) between January and April of 1996, when she worked there.
 (20) Q So, if I could summarize your testimony,
 (21) approximately five times you saw her before she left the
 (22) White House, and approximately nine times after she left the
 (23) employment of the White House?
 (24) A I know there were several times in '97. I've told
 (25) you that I've looked at my calendar and I tell you what I

Page 33

(1) think the outer limits are. I would think that would sound
 (2) about right. There could be, in that first four-month
 (3) period, there, maybe there's one or two more, maybe there's
 (4) one less. I just don't know. I don't remember. I didn't
 (5) keep records.
 (6) But I'm giving you what I specifically remember and
 (7) then what I generally remember. I'm doing the best to be
 (8) helpful to you.
 (9) Q Have you reviewed the records for December 28th,
 (10) 1997, Mr. President?
 (11) A Yes, sir, I have.
 (12) Q Do you believe that Ms. Lewinsky was at the White
 (13) House and saw you on December 28th, 1997?
 (14) A Yes, sir, I do.
 (15) Q And do you remember talking with Ms. Lewinsky about
 (16) her subpoena that she received for the Paula Jones case on
 (17) that day?
 (18) A I remember talking with Ms. Lewinsky about her
 (19) testimony, or about the prospect that she might have to give
 (20) testimony. And she, she talked to me about that. I remember
 (21) that.
 (22) Q And you also gave her Christmas gifts, is that not
 (23) correct, Mr. President?
 (24) A That is correct. They were Christmas gifts and
 (25) they were going-away gifts. She was moving to New York to,

Page 34

(1) taking a new job, starting a new life. And I gave her some
 (2) gifts.
 (3) Q And you actually requested this meeting, is that
 (4) not correct?
 (5) A I don't remember that, Mr. Bittman, but it's quite
 (6) possible that I invited her to come by before she left town.
 (7) But usually when we met, she requested the meetings. And my
 (8) recollection is, in 1997 she asked to meet with me several
 (9) times when I could not meet with her and did not do so. But
 (10) it's quite possible that I -- that because she had given me a
 (11) Christmas gift, and because she was leaving, that I invited
 (12) her to come by the White House and get a couple of gifts
 (13) before she left town.
 (14) I don't remember who requested the meeting though.
 (15) I'm sorry, I don't.
 (16) Q You were alone with her on December 28, 1997, is
 (17) that --
 (18) A Yes, sir.
 (19) Q -- right?
 (20) A I was.
 (21) Q The gifts that you gave her were a canvas bag from
 (22) The Black Dog restaurant at Martha's Vineyard, is that
 (23) right?
 (24) A Well, that was just, that was just something I had
 (25) in the place to, to contain the gifts. But I believe that

Page 35

(1) the gifts I gave her were -- I put them in that bag. That's
 (2) what I had there, and I knew she liked things from The Black
 (3) Dog. So, I gave her -- I think that's what I put the
 (4) presents in.
 (5) I remember what the presents were. I don't
 (6) remember what the bag was I gave them in.
 (7) Q Did you also give her a marble bear's head carving
 (8) from Vancouver, Canada?
 (9) A I did do that. I remember that.
 (10) Q And you also gave her a Rockettes blanket; that is,
 (11) the famous Rockettes from New York?
 (12) A I did do that. I had that. I had had that in my
 (13) possession for a couple of years but had never used it, and
 (14) she was going to New York. So, I thought it would be a nice
 (15) thing to give her.
 (16) Q You gave her a box of cherry chocolates, is that
 (17) right?
 (18) A I don't remember that, sir. I mean, there could
 (19) have been. I, I just don't remember. I remember giving the
 (20) bear and the throw. I don't remember what else. And it
 (21) seems to me like there was one other thing in that bag. I
 (22) didn't remember the cherry chocolates.
 (23) Q How about a pin of the New York skyline? Did you
 (24) give --
 (25) A That --

Page 36

(1) Q -- her that?
 (2) A That could have been in there. I seem to remember
 (3) I gave her some kind of pin.
 (4) Q What about a pair of joke sunglasses?
 (5) A I don't remember that. I'm not denying it. I just
 (6) -- I'm telling you what I remember and what I don't.
 (7) Q You had given Ms. Lewinsky gifts on other occasions
 (8) though, is that right, Mr. President?
 (9) A Yes, I had.
 (10) Q This, though, was -- you gave her the most gifts
 (11) that you had ever given her in a single day, is that right?
 (12) A Well, that's probably true. It was sort of like a
 (13) going-away present and a Christmas present as well. And she
 (14) had given me a particularly nice book for Christmas, an
 (15) antique book on Presidents. She knew that I collected old
 (16) books and it was a very nice thing. And I just thought I
 (17) ought to get up a few things and give them to her before she
 (18) left.
 (19) Q You mentioned that you discussed her subpoena in
 (20) the Paula Jones case. Tell us specifically, what did you
 (21) discuss?
 (22) A No, sir, that's not what I said. I said, my
 (23) recollection is I knew by then, of course, that she had
 (24) gotten a subpoena. And I knew that she was, therefore, was
 (25) slated to testify. And she mentioned to me -- and I believe

Page 37

(1) it was at this meeting. She mentioned -- I remember a
 (2) conversation about the possibility of her testifying. I
 (3) believe it must have occurred on the 28th.
 (4) She mentioned to me that she did not want to
 (5) testify. So, that's how it came up. Not in the context of,
 (6) I heard you have a subpoena, let's talk about it.
 (7) She raised the issue with me in the context of her
 (8) desire to avoid testifying, which I certainly understood; not
 (9) only because there were some embarrassing facts about our
 (10) relationship that were inappropriate, but also because a
 (11) whole lot of innocent people were being traumatized and
 (12) dragged through the mud by these Jones lawyers with their
 (13) dragnet strategy. They --
 (14) Q So --
 (15) A And so I -- and since she didn't know Paula Jones
 (16) and knew nothing about sexual harassment, and certainly had
 (17) no experience with that, I, I clearly understood why she
 (18) didn't want to be a part of it.
 (19) Q And you didn't want her to testify, did you? You
 (20) didn't want her to disclose these embarrassing facts of this
 (21) inappropriate intimate relationship that you had, is that
 (22) correct?
 (23) A Well, I did not want her to have to testify and go
 (24) through that. And, of course, I didn't want her to do that,
 (25) of course not.

Page 38

(1) Q Did you want those facts, not only the fact that
(2) she would testify, but did you want the facts that she had
(3) about your embarrassing inappropriate intimate relationship
(4) to be disclosed?
(5) A Not there, but not in any context. However, I, I
(6) never had any high confidence that they wouldn't be.
(7) Q Did anyone, as far as you knew, know about your
(8) embarrassing inappropriate intimate relationship that you had
(9) with Ms. Lewinsky?
(10) A At that time, I was unaware that she had told
(11) anyone else about it. But if, if I had known that, it would
(12) not have surprised me.
(13) Q Had you told anyone?
(14) A Absolutely not.
(15) Q Had you tried, in fact, not to let anyone else know
(16) about this relationship?
(17) A Well, of course.
(18) Q What did you do?
(19) A Well, I never said anything about it, for one
(20) thing. And I did what people do when they do the wrong
(21) thing. I tried to do it where nobody else was looking at it.
(22) Q How many times did you do that?
(23) A Well, if you go back to my statement, I remember
(24) there were a few times in '96, I can't say with any
(25) certainty. There was once in early '97. After she left the

Page 39

(1) White House, I do not believe I ever had any inappropriate
(2) contact with her in the rest of '96. There was one occasion
(3) in '97 when, regrettably, that we were together for a few
(4) minutes, I think about 20 minutes, and there was
(5) inappropriate contact. And after that, to the best of my
(6) memory and belief, it did not occur again.
(7) Q Did you tell her in the conversation about her
(8) being subpoenaed - she was upset about it, you acknowledge
(9) that?
(10) A (Witness nodded indicating an affirmative
(11) response.)
(12) Q I'm sorry, you have to respond for the record. Yes
(13) or no? Do you agree that she was upset about being
(14) subpoenaed?
(15) A Oh, yes, sir, she was upset. She - well, she -
(16) we - she didn't - we didn't talk about a subpoena. But she
(17) was upset. She said, I don't want to testify, I know nothing
(18) about this; I certainly know nothing about sexual harassment;
(19) why do they want me to testify. And I explained to her why
(20) they were doing this, and why all these women were on these
(21) lists, people that they knew good and well had nothing to do
(22) with any sexual harassment.
(23) I explained to her that it was a political lawsuit.
(24) They wanted to get whatever they could under oath that was
(25) damaging to me, and then they wanted to leak it in violation

Page 40

(1) of the Judge's orders, and turn up their nose and say, well,
(2) you can't prove we did it. Now, that was their strategy.
(3) And that they were very frustrated because everything they
(4) leaked so far was old news. So, they desperately were trying
(5) to validate this massive amount of money they'd spent by
(6) finding some new news. And -
(7) Q You were familiar -
(8) A - she didn't want to be caught up in that, and I
(9) didn't blame her.
(10) Q You were familiar, weren't you, Mr. President, that
(11) she had received a subpoena. You've already acknowledged
(12) that.
(13) A Yes, sir, I was.
(14) Q And Mr. Jordan informed you of that, is that right?
(15) A No, sir, I believe - and I believe I testified to
(16) this in my deposition. I think the first person who told me
(17) that she had been subpoenaed was Bruce Lindsey. I think the
(18) first - and I was - in this deposition, it's a little bit
(19) cloudy, but I was trying to remember who the first person who
(20) told me was, because the question was, again as I remember it
(21) - could we go to that in the deposition, since you asked me
(22) that?
(23) Q Actually, I think you're - with all respect, I
(24) think you may be confusing when Mr. Lindsey - well, perhaps
(25) Mr. Lindsey did tell you she was subpoenaed, I don't know.

Page 41

(1) But in your deposition, you were referring to Mr. Lindsey
(2) notifying you that she had been identified as a witness.
(3) A Where is that, sir? I don't want to get - I just
(4) want - what page is that?
(5) Q Well, actually -
(6) A No, it had to be, because I saw a witness list much
(7) earlier than that.
(8) Q Much earlier than December 28?
(9) A Oh, sure. And it had been earlier than - she
(10) would - I believe Monica -
(11) MR. KENDALL: Page 69.
(12) THE WITNESS: I believe Monica Lewinsky's name was
(13) on a witness list earlier than she was subpoenaed.
(14) BY MR. BITTMAN:
(15) Q Yes.
(16) A So, I believe when I was answering this question,
(17) at least I thought I was answering when I found out - yes.
(18) See, there's - on page 68, "Did anyone other than your
(19) attorneys ever tell you that Monica Lewinsky had been served
(20) with a subpoena in this case?" Then I said, "I don't think
(21) so." Then I [sic] said, "Did you ever talk to Monica 'about
(22) the possibility that she might be asked to testify in this
(23) case?"
(24) Then I gave an answer that was nonresponsive, that
(25) really tried to finish the answer above. I said, "Bruce

Page 42

(1) Lindsey, I think Bruce Lindsey told me that she was, I think
(2) maybe that's the first person told me she was. I want to be
(3) as accurate as I can.
(4) And that - I believe that Bruce is the first
(5) person who told me that Monica had gotten a subpoena.
(6) Q Did you, in fact, have a conversation with Mr.
(7) Jordan on the evening of December 19, 1997, in which he
(8) talked to you about Monica being in Mr. Jordan's office,
(9) having a copy of the subpoena, and being upset about being
(10) subpoenaed?
(11) A I remembered that Mr. Jordan was in the White House
(12) on December 19th and for an event of some kind. That he came
(13) up to the Residence floor and told me that he had, that
(14) Monica had gotten a subpoena and, or that Monica was going to
(15) have to testify. And I think he told me he recommended a
(16) lawyer for her. I believe that's what happened. But it was
(17) a very brief conversation. He was there for some other
(18) reason.
(19) Q And if Mr. Jordan testified that he had also spoken
(20) to you at around 5 p.m., and the White House phone logs
(21) reflect this, that he called you at around the time he met
(22) with Ms. Lewinsky and informed you then that she had been
(23) subpoenaed, is that consistent with your memory? Also on the
(24) 19th?
(25) A I had a lot of phone conversations with Vernon

Page 43

(1) about this. I didn't keep records of them. I now have some
(2) records. My memory is not clear and my testimony on that was
(3) not clear. I just knew that I talked to Vernon at some time,
(4) but I thought that Bruce was the first person who told me.
(5) Q But Mr. Jordan had also told you, is that right?
(6) A Yes. I now know I had a conversation with Mr.
(7) Jordan about it where he said something to me about that.
(8) Q And that was probably on the 19th, December 19th?
(9) A Well, I know I saw him on the 19th. So, I'm quite
(10) sure. And if he says he talked to me on the 19th, I believe
(11) he would have better records and I certainly think he's a
(12) truthful person.
(13) Q Getting back to your meeting with Ms. Lewinsky on
(14) December 28, you are aware that she's been subpoenaed. You
(15) are aware, are you not, Mr. President, that the subpoena
(16) called for the production of, among other things, all the
(17) gifts that you had given Ms. Lewinsky? You were aware of
(18) that on December 28th, weren't you?
(19) A I'm not sure. And I understand this is an
(20) important question. I did have a conversation with Ms.
(21) Lewinsky at some time about gifts, the gifts I'd given her.
(22) I do not know whether it occurred on the 28th, or whether it
(23) occurred earlier. I do not know whether it occurred in
(24) person or whether it occurred on the telephone. I have
(25) searched my memory for this, because I know it's an important

Page 44

(1) issue.
 (2) Perhaps if you -- I can tell you what I remember
 (3) about the conversation and you can see why I'm having trouble
 (4) placing the date.
 (5) Q Please.
 (6) A The reason I'm not sure it happened on the 28th is
 (7) that my recollection is that Ms. Lewinsky said something to
 (8) me like, what if they ask me about the gifts you've given me.
 (9) That's the memory I have. That's why I question whether it
 (10) happened on the 28th, because she had a subpoena with her,
 (11) request for production.
 (12) And I told her that if they asked her for gifts,
 (13) she'd have to give them whatever she had, that that's what
 (14) the law was.
 (15) And let me also tell you, Mr. Bittman, if you go
 (16) back and look at my testimony here, I actually asked the
 (17) Jones lawyers for help on one occasion, when they were asking
 (18) me what gifts I had given her, so they could -- I was never
 (19) hung up about this gift issue. Maybe it's because I have a
 (20) different experience. But, you know, the President gets
 (21) hundreds of gifts a year, maybe more. I have always given a
 (22) lot of gifts to people, especially if they give me gifts.
 (23) And this was no big deal to me. I mean, it's nice. I enjoy
 (24) it. I gave dozens of personal gifts to people last
 (25) Christmas. I give gifts to people all the time. Friends of

Page 45

(1) mine give me gifts all the time, give me ties, give me books,
 (2) give me other things. So, it was just not a big deal.
 (3) And I told Ms. Lewinsky that, just -- I said, you
 (4) know, if they ask you for this, you'll have to give them
 (5) whatever you have. And I think, Mr. Bittman, it must have
 (6) happened before then, because -- either that, or Ms. Lewinsky
 (7) didn't want to tell me that she had the subpoena, because
 (8) that was the language I remember her using.
 (9) Q Well, didn't she tell you, Mr. President, that the
 (10) subpoena specifically called for a hat pin that you had
 (11) produced, pardon me, that you had given her?
 (12) A I don't remember that. I remember -- sir, I've
 (13) told you what I remember. That doesn't mean that my memory
 (14) is accurate. A lot of things have happened in the last
 (15) several months, and a lot of things were happening then. But
 (16) my memory is she asked me a general question about gifts.
 (17) And my memory is she asked me in the hypothetical. So, it's
 (18) possible that I had a conversation with her before she got a
 (19) subpoena. Or it's possible she didn't want to tell me that
 (20) was part of the subpoena. I don't know.
 (21) But she may have been worried about this gift
 (22) business. But it didn't bother me. My experience was
 (23) totally different. I told her, I said, look, the way these
 (24) things work is, when a person get a subpoena, you have to
 (25) give them whatever you have; that's what's the rule, that's

Page 46

(1) what the law is.
 (2) And when I was asked about this in my deposition,
 (3) even though I was not trying to be helpful particularly to
 (4) these people that I thought were not well-motivated, or being
 (5) honest or even lawful in their conduct vis-a-vis me, that is,
 (6) the Jones legal team, I did ask them specifically to
 (7) enumerate the gifts. I asked them to help me because I
 (8) couldn't remember the specifics.
 (9) So, all I'm saying is, it didn't -- I wasn't
 (10) troubled by this gift issue.
 (11) Q And your testimony is that Ms. Lewinsky was
 (12) concerned about her turning over any gifts that you had given
 (13) her, and that your recommendation to her was, absolutely,
 (14) Monica, you have to produce everything that I have given you.
 (15) Is that your testimony?
 (16) A My testimony is what I have said, and let me
 (17) reiterate it. I don't want to agree to a characterization of
 (18) it. I want to just say what it was.
 (19) My testimony is that my memory is that on some day
 (20) in December, and I'm sorry I don't remember when it was, she
 (21) said, well, what if they ask me about the gifts you have
 (22) given me. And I said, well, if you get a request to produce
 (23) those, you have to give them whatever you have.
 (24) And it just, to me, it -- I don't -- I didn't then,
 (25) I don't now see this as a problem. And if she thought it was

Page 47

(1) a problem, I think it -- it must have been from a, really, a
 (2) misapprehension of the circumstances. I certainly never
 (3) encouraged her not to, to comply lawfully with a subpoena.
 (4) Q Mr. President, if your intent was, as you have
 (5) earlier testified, that you didn't want anybody to know about
 (6) this relationship you had with Ms. Lewinsky, why would you
 (7) feel comfortable giving her gifts in the middle of discovery
 (8) in the Paula Jones case?
 (9) A Well, sir, for one thing, there was no existing
 (10) improper relationship at that time. I had, for nearly a
 (11) year, done my best to be a friend to Ms. Lewinsky, to be a
 (12) counselor to her, to give her good advice, and to help her.
 (13) She had, for her part, most of the time, accepted the changed
 (14) circumstances. She talked to me a lot about her life, her
 (15) job ambitions, and she continued to give me gifts. And I
 (16) felt that it was a right thing to do to give her gifts back.
 (17) I have always given a lot of people gifts. I have
 (18) always been given gifts. I do not think there is anything
 (19) improper about a man giving a woman a gift, or a woman giving
 (20) a man a gift, that necessarily connotes an improper
 (21) relationship. So, it didn't bother me.
 (22) I wasn't -- you know, this was December 28th. I
 (23) was -- I gave her some gifts. I wasn't worried about it. I
 (24) thought it was an all right thing to do.
 (25) Q What about notes and letters, cards, letters and

Page 48

(1) notes to Ms. Lewinsky? After this relationship, this
 (2) inappropriate intimate relationship between you and Ms.
 (3) Lewinsky ended, she continued to send you numerous intimate
 (4) notes and cards, is that right?
 (5) A Well, they were -- some of them were, were somewhat
 (6) intimate. I'd say most of them, most of the notes and cards
 (7) were, were affectionate all right, but, but she had clearly
 (8) accepted the fact that there could be no contact between us
 (9) that was in any way inappropriate.
 (10) Now, she, she sent cards sometimes that were just
 (11) funny, even a little bit off-color, but they were funny. She
 (12) liked to send me cards, and I got a lot of those cards;
 (13) several, anyway, I don't know a lot. I got a few.
 (14) Q She professed her love to you in these cards after
 (15) the end of the relationship, didn't she?
 (16) A Well, --
 (17) Q She said she loved you?
 (18) A Sir, the truth is that most of the time, even when
 (19) she was expressing her feelings for me in affectionate terms,
 (20) I believed that she had accepted, understood my decision to
 (21) stop this inappropriate contact. She knew from the very
 (22) beginning of our relationship that I was apprehensive about
 (23) it. And I think that in a way she felt a little freer to be
 (24) affectionate, because she knew that nothing else was going to
 (25) happen. I can't explain entirely what was in her mind.

Page 49

(1) But most of these messages were not what you would
 (2) call over the top. They weren't things that, if you read
 (3) them, you would say, oh, my goodness, these people are having
 (4) some sort of sexual affair.
 (5) Q Mr. President, the question --
 (6) A But some of them were quite affectionate.
 (7) Q My question was, did she or did she not profess her
 (8) love to you in those cards and letters that she sent to you
 (9) after the relationship ended?
 (10) A Most of them were signed, "Love", you know, "Love,
 (11) Monica." I don't know that I would consider -- I don't
 (12) believe that in most of these cards and letters she professed
 (13) her love, but she might well have. I -- but, you know, love
 (14) can mean different things, too, Mr. Bittman. I have -- there
 (15) are a lot of women with whom I have never had any
 (16) inappropriate conduct who are friends of mine, who will say
 (17) from time to time, I love you. And I know that they don't
 (18) mean anything wrong by that.
 (19) Q Specifically, Mr. President, do you remember a card
 (20) she sent you after she saw the movie Titanic, in which she
 (21) said that she reminisced or dreamed about the romantic
 (22) feelings that occurred in the movie, and how that reminded
 (23) her of you two? Do you remember that?
 (24) A No, sir, but she could have sent it. I -- just
 (25) because I don't remember it doesn't mean it wasn't there.

Page 50

[1] Q You're not denying that, that -
 [2] A Oh, no. I wouldn't deny that. I just don't
 [3] remember it. You asked me if I remembered. I don't. She
 [4] might have done it.
 [5] Q Do you ever remember telling her, Mr. President,
 [6] that she should not write some of the things that she does in
 [7] those cards and letters that she sends to you because it
 [8] reveals, if disclosed, this relationship that you had, and
 [9] that she shouldn't do it?
 [10] A I remember telling her she should be careful what
 [11] she wrote, because a lot of it was clearly inappropriate and
 [12] would be embarrassing if somebody else read it. I don't
 [13] remember when I said that. I don't remember whether it was
 [14] in '96 or when it was. I don't remember.
 [15] Q Embarrassing, in that it was revealing of the
 [16] intimate relationship that you and she had, is that right?
 [17] A I do not know when I said this. So, I don't know
 [18] whether we did have any sort of inappropriate relationship at
 [19] the time I said that to her. I don't remember. But it's
 [20] obvious that if she wrote things that she should not have
 [21] written down and someone else read it, that it would be
 [22] embarrassing.
 [23] Q She certainly sent you something like that after
 [24] the relationship began, didn't she? And so, therefore, there
 [25] was, at the time she sent it, something inappropriate going

Page 51

[1] on?
 [2] A Well, my recollection is that she - that maybe
 [3] because of changed circumstances in her own life in 1997,
 [4] after there was no more inappropriate contact, that she sent
 [5] me more things in the mail, and that there was sort of a
 [6] disconnect sometimes between what she was saying and the
 [7] plain facts of our relationship. And I don't know what
 [8] caused that. But it may have been dissatisfaction with the
 [9] rest of her life. I don't know.
 [10] Q You know, she had, from the time I first met her,
 [11] talked to me about the rest of her personal life, and it may
 [12] be that there was some reason for that. It may be that when
 [13] I did the right thing and made it stick, that in a way she
 [14] felt a need to cling more closely, or try to get closer to
 [15] me, even though she knew nothing improper was happening or
 [16] was going to happen. I don't know the answer to that.
 [17] Q After you gave her the gifts on December 28th, did
 [18] you speak with your secretary, Ms. Currie, and ask her to
 [19] pick up a box of gifts that were some compilation of gifts
 [20] that Ms. Lewinsky would have -
 [21] A No, sir, I didn't do that.
 [22] Q - to give to Ms. Currie?
 [23] A I did not do that.
 [24] Q When you testified in the Paula Jones case, this
 [25] was only two and a half weeks after you had given her these

Page 52

[1] six gifts, you were asked, at page 75 in your deposition,
 [2] lines 2 through 5, "Well, have you ever given any gifts to
 [3] Monica Lewinsky?" And you answer, "I don't recall."
 [4] And you were correct. You pointed out that you
 [5] actually asked them, for prompting, "Do you know what they
 [6] were?"
 [7] A I think what I meant there was I don't recall what
 [8] they were, not that I don't recall whether I had given them.
 [9] And then if you see, they did give me these specifics, and I
 [10] gave them quite a good explanation here. I remembered very
 [11] clearly what the facts were about The Black Dog. And I said
 [12] that I could have given her a hat pin and a Walt Whitman
 [13] book; that I did not remember giving her a gold brooch, which
 [14] was true. I didn't remember it. I may have given it to her,
 [15] but I didn't remember giving her one.
 [16] They didn't ask me about the, about the Christmas
 [17] gifts, and I don't know why I didn't think to say anything
 [18] about them. But I have to tell you again, I even invited
 [19] them to have a list.
 [20] It was obvious to me by this point in the
 [21] definition, in this deposition, that they had, these people
 [22] had access to a lot of information from somewhere, and I
 [23] presume it came from Linda Tripp. And I had no interest in
 [24] not answering their questions about these gifts. I do not
 [25] believe that gifts are incriminating, nor do I think they are

Page 53

[1] wrong. I think it was a good thing to do. I'm not, I'm
 [2] still not sorry I gave Monica Lewinsky gifts.
 [3] Q Why did you assume that that information came from
 [4] Linda Tripp?
 [5] A I didn't then.
 [6] Q Well, you didn't? I thought you just testified you
 [7] did then?
 [8] A No, no, no. I said I now assume that because -
 [9] You now assume.
 [10] A - of all of the subsequent events. I didn't know.
 [11] I just knew that -
 [12] Q Let me ask you about -
 [13] A - that somebody had access to some information and
 [14] they may have known more about this than I did.
 [15] Q Let me ask you about the meeting you had with Betty
 [16] Currie at the White House on Sunday, January 18 of this year,
 [17] the day after your deposition. First of all, you didn't -
 [18] Mrs. Currie, your secretary of six-some years, you never
 [19] allowed her, did you, to watch whatever intimate activity you
 [20] did with Ms. Lewinsky, did you?
 [21] A No, sir, not to my knowledge.
 [22] Q And as far as you know, she couldn't hear anything
 [23] either, is that right?
 [24] A There were a couple of times when Monica was there
 [25] when I asked Betty to be places where she could hear, because

Page 54

[1] Monica was upset and I - this was after there was - all the
 [2] inappropriate contact had been terminated.
 [3] Q No, I'm talking -
 [4] A But -
 [5] Q - about the times that you actually had the
 [6] intimate contact.
 [7] A She was - I believe that - well, first of all, on
 [8] that one occasion in 1997, I do not know whether Betty was in
 [9] the White House after the radio address in the Oval Office
 [10] complex. I believe she probably was, but I'm not sure. But
 [11] I'm certain that someone was there. I always - always
 [12] someone was there.
 [13] In 1996, I think most of the times that Ms.
 [14] Lewinsky was there, there may not have been anybody around
 [15] except maybe coming in and out, but not permanently so. I -
 [16] that's correct. I never - I didn't try to involve Betty in
 [17] that in any way.
 [18] Q Well, not only did you not try to involve her, you
 [19] specifically tried to exclude her and everyone else, isn't
 [20] that right?
 [21] A Well, yes. I've never - I mean, it's almost
 [22] humorous, sir. I'd, I'd have to be an exhibitionist not
 [23] to have tried to exclude everyone else.
 [24] Q So, if Ms. Currie testified that you approached her
 [25] on the 18th, or you spoke with her and you said, you were

Page 55

[1] always there when she was there, she wasn't, was she? That
 [2] is, Mrs. Currie?
 [3] A She was always there in the White House, and I was
 [4] concerned - let me back up and say -
 [5] Q What about the radio address, Mr. President?
 [6] A Let me back up a second, Mr. Bittman. I knew about
 [7] the radio address. I was sick after it was over and I, I was
 [8] pleased at that time that it had been nearly a year since any
 [9] inappropriate contact had occurred with Ms. Lewinsky. I
 [10] promised myself it wasn't going to happen again. The facts
 [11] are complicated about what did happen and how it happened.
 [12] But, nonetheless, I'm responsible for it. On that night, she
 [13] didn't.
 [14] I was more concerned about the times after that
 [15] when Ms. Lewinsky was upset, and I wanted to establish at
 [16] least that I had not - because these questions were - some
 [17] of them were off the wall. Some of them were way out of
 [18] line, I thought.
 [19] And what I wanted to establish was that Betty was
 [20] there at all other times in the complex, and I wanted to know
 [21] what Betty's memory was about what she heard, what she could
 [22] hear. And what I did not know was - I did not know that.
 [23] And I was trying to figure out, and I was trying to figure
 [24] out in a hurry because I knew something was up.
 [25] Q So, you wanted -

Page 56

(1) A After that deposition.
 (2) Q - to check her memory for what she remembered, and
 (3) that is -
 (4) A That's correct.
 (5) Q - whether she remembered nothing, or whether she
 (6) remembered an inappropriate intimate -
 (7) A Oh, no, no, no, no.
 (8) Q - relationship?
 (9) A No. I didn't ask her about it in that way. I
 (10) asked her about what the - what I was trying to determine
 (11) was whether my recollection was right and that she was always
 (12) in the office complex when Monica was there, and whether she
 (13) thought she could hear any conversations we had, or did she
 (14) hear any.
 (15) And then I asked her specifically about a couple of
 (16) times when - once when I asked her to remain in the dining
 (17) room, Betty, while I met with Monica in my study. And once
 (18) when I took Monica in the, the small office Nancy Hemreich
 (19) occupies right next to Betty's and talked to her there for a
 (20) few minutes. That's my recollection of that.
 (21) I was trying to - I knew, Mr. Bittman, to a
 (22) reasonable certainty that I was going to be asked more
 (23) questions about this. I didn't really expect you to be in
 (24) the Jones case at the time. I thought what would happen is
 (25) that it would break in the press, and I was trying to get the

Page 57

(1) facts down. I was trying to understand what the facts were.
 (2) Q If Ms. Currie testified that these were not really
 (3) questions to her, that they were more like statements, is
 (4) that not true?
 (5) A Well, I can't testify as to what her perception
 (6) was. I can tell you this. I was trying to get information
 (7) in a hurry. I was downloading what I remembered. I think
 (8) Ms. Currie would also testify that I explicitly told her,
 (9) once I realized that you were involved in the Jones case -
 (10) you, the Office of Independent Counsel - and that she might
 (11) have to be called as a witness, that she should just go in
 (12) there and tell the truth, tell what she knew, and be
 (13) perfectly truthful.
 (14) So, I was not trying to get Betty Currie to say
 (15) something that was untruthful. I was trying to get as much
 (16) information as quickly as I could.
 (17) Q What information were you trying to get from her
 (18) when you said, I was never alone with her, right?
 (19) A I don't remember exactly what I did say with her.
 (20) That's what you say I said.
 (21) Q If Ms. Currie testified to that, if she says you
 (22) told her, I was never alone with her, right?
 (23) A Well, I was never alone with her -
 (24) Q Did you not say that, Mr. President?
 (25) A Mr. Bittman, just a minute. I was never alone with

Page 58

(1) her, right, might be a question. And what I might have meant
 (2) by that is, in the Oval Office complex.
 (3) Could -
 (4) Q Well, you knew the answer to that, didn't you?
 (5) A We've been going for more than an hour. Would you
 (6) mind if we took a break? I need to go to the restroom.
 (7) MR. BITTMAN: Let's take a break.
 (8) MR. KENDALL: It's 2:38.
 (9) (Whereupon, the proceedings were recessed from 2:38 p.m.
 (10) until 2:48 p.m.)
 (11) MR. KENDALL: It is 2:38 - sorry, 2:48.
 (12) BY MR. WISENBERG:
 (13) Q Mr. President, I want to, before I go into a new
 (14) subject area, briefly go over something you were talking
 (15) about with Mr. Bittman.
 (16) The statement of your attorney, Mr. Bennett, at the
 (17) Paula Jones deposition, "Counsel is fully aware" - it's page
 (18) 54, line 5 - "Counsel is fully aware that Ms. Lewinsky has
 (19) filed, has an affidavit which they are in possession of
 (20) saying that there is absolutely no sex of any kind in any
 (21) manner, shape or form, with President Clinton".
 (22) That statement is made by your attorney in front of
 (23) Judge Susan Webber Wright, correct?
 (24) A That's correct.
 (25) Q That statement is a completely false statement.

Page 59

(1) Whether or not Mr. Bennett knew of your relationship with Ms.
 (2) Lewinsky, the statement that there was "no sex of any kind in
 (3) any manner, shape or form, with President Clinton," was an
 (4) utterly false statement. Is that correct?
 (5) A It depends on what the meaning of the word "is" is.
 (6) If the - if he - if "is" means is and never has been, that
 (7) is not - that is one thing. If it means there is none, that
 (8) was a completely true statement.
 (9) But, as I have testified, and I'd like to testify
 (10) again, this is - it is somewhat unusual for a client to be
 (11) asked about his lawyer's statements, instead of the other way
 (12) around. I was not paying a great deal of attention to this
 (13) exchange. I was focusing on my own testimony.
 (14) And if you go back and look at the sequence of
 (15) this, you will see that the Jones lawyers decided that this
 (16) was going to be the Lewinsky deposition, not the Jones
 (17) deposition. And, given the facts of their case, I can
 (18) understand why they made that decision. But that is not how
 (19) I prepared for it. That is not how I was thinking about it.
 (20) And I am not sure, Mr. Wisenberg, as I sit here
 (21) today, that I sat there and followed all these interchanges
 (22) between the lawyers. I'm quite sure that I didn't follow all
 (23) the interchanges between the lawyers all that carefully. And
 (24) I don't really believe, therefore, that I can say Mr.
 (25) Bennett's testimony or statement is testimony and is

Page 60

(1) imputable to me. I didn't - I don't know that I was even
 (2) paying that much attention to it.
 (3) Q You told us you were very well prepared for the
 (4) deposition.
 (5) A No. I said I was very well prepared to talk about
 (6) Paula Jones and to talk about Kathleen Willey, because she
 (7) had made a related charge. She was the only person that I
 (8) think I was asked about who had anything to do with anything
 (9) that would remotely approximate sexual harassment. The rest
 (10) of this looked to me like it was more of a way to harass me.
 (11) Q You are the President of the United States and your
 (12) attorney tells a United States District Court Judge that
 (13) there is no sex of any kind, in any way, shape or form,
 (14) whatsoever. And you feel no obligation to do anything about
 (15) that at that deposition, Mr. President?
 (16) A I have told you, Mr. Wisenberg, I will tell you for
 (17) a third time. I am not even sure that when Mr. Bennett made
 (18) that statement that I was concentrating on the exact words he
 (19) used.
 (20) Now, if someone had asked me on that day, are you
 (21) having any kind of sexual relations with Ms. Lewinsky, that
 (22) is, asked me a question in the present tense, I would have
 (23) said no. And it would have been completely true.
 (24) Q Was Mr. Bennett aware of this tense-based
 (25) distinction you are making now -

Page 61

(1) A I don't -
 (2) MR. KENDALL: I'm going to object to any questions
 (3) about communications with private counsel.
 (4) MR. WISENBERG: Well, the witness has already
 (5) testified, I think, that Mr. Bennett didn't know about the
 (6) inappropriate relationship with Ms. Lewinsky. I guess -
 (7) THE WITNESS: Well, you'll have to ask him that,
 (8) you know. He was not a sworn witness and I was not paying
 (9) that close attention to what he was saying. I've told you
 (10) that repeatedly. I was - I don't - I never even focused on
 (11) that until I read it in this transcript in preparation for
 (12) this testimony.
 (13) When I was in there, I didn't think about my
 (14) lawyers. I was, frankly, thinking about myself and my
 (15) testimony and trying to answer the questions.
 (16) BY MR. WISENBERG:
 (17) Q I just want to make sure I understand, Mr.
 (18) President. Do you mean today that because you were not
 (19) engaging in sexual activity with Ms. Lewinsky during the
 (20) deposition that the statement of Mr. Bennett might be
 (21) literally true?
 (22) A No, sir. I mean that at the time of the
 (23) deposition, it had been - that was well beyond any point of
 (24) improper contact between me and Ms. Lewinsky. So that anyone
 (25) generally speaking in the present tense, saying there is not

Page 62

(1) an improper relationship, would be telling the truth if that
 (2) person said there was not, in the present tense; the present
 (3) tense encompassing many months. That's what I meant by that.
 (4) Not that I was -- I wasn't trying to give you a
 (5) cute answer, that I was obviously not involved in anything
 (6) improper during a deposition. I was trying to tell you that
 (7) generally speaking in the present tense, if someone said
 (8) that, that would be true. But I don't know what Mr. Bennett
 (9) had in his mind. I don't know. I didn't pay any attention
 (10) to this colloquy that went on. I was waiting for my
 (11) instructions as a witness to go forward. I was worried about
 (12) my own testimony.
 (13) Q I want to go back to some questions about Mr.
 (14) Jordan and we are going to touch a little bit on the December
 (15) 19th meeting and some others. Mr. Jordan is a long-time
 (16) friend of yours, is that correct, Mr. President?
 (17) A Yes, sir. We've been friends probably 20 years,
 (18) maybe more.
 (19) Q You said you consider him to be a truthful person,
 (20) correct?
 (21) A I do.
 (22) Q If Mr. Jordan has told us that he visited you in
 (23) the Residence on the night of the 19th, after a White House
 (24) holiday dinner, to discuss Monica Lewinsky and her subpoena
 (25) with you, do you have any reason to doubt it?

Page 63

(1) A No. I've never known him to say anything that
 (2) wasn't true. And his memory of these events, I think, would
 (3) be better than mine because I had a lot of other things going
 (4) on.
 (5) Q We have WAVE records that will show that, but in
 (6) the interest of time I'm not going to -- since you don't
 (7) dispute that, I'm not going to show them right now.
 (8) And, in fact, that was the very day Monica Lewinsky
 (9) was subpoenaed, wasn't it, the night that he came to see you?
 (10) A I don't have an independent memory of that, but you
 (11) would probably know that. I mean, I'm sure there is a record
 (12) of when she got her subpoena.
 (13) Q If Mr. Jordan has told us that he spoke with you
 (14) over the phone within about an hour of Monica receiving her
 (15) subpoena, and later visited you that very day, the night at
 (16) the White House, to discuss it, again you'd have no reason to
 (17) doubt him, is that correct?
 (18) A I've already -- I believe I've already testified
 (19) about that here today, that I had lots of conversations with
 (20) Vernon. I'm sure that I had lots of conversations with him
 (21) that included comments about this. And if he has a specific
 (22) memory of when I had some conversation on a certain day, I
 (23) would be inclined to trust his memory over mine, because
 (24) under the present circumstances my head's probably more
 (25) cluttered than his, and my schedule is probably busier. He's

Page 64

(1) probably got better records.
 (2) Q And when Mr. Jordan met with you at the Residence
 (3) that night, sir, he asked you if you'd been involved in a
 (4) sexual relationship with Monica Lewinsky, didn't he?
 (5) A I do not remember exactly what the nature of the
 (6) conversation was. I do remember that I told him that there
 (7) was no sexual relationship between me and Monica Lewinsky,
 (8) which was true. And that -- then all I remember for the rest
 (9) is that he said he had referred her to a lawyer, and I
 (10) believe it was Mr. Carter, and I don't believe I've ever met
 (11) Mr. Carter. I don't think I know him.
 (12) Q Mr. President, if Mr. Jordan has told us that he
 (13) had a very disturbing conversation with Ms. Lewinsky that
 (14) day, then went over to visit you at the White House, and that
 (15) before he asked you the question about a sexual relationship,
 (16) related that disturbing conversation to you, the conversation
 (17) being that Ms. Lewinsky had a fixation on you and thought
 (18) that perhaps the First Lady would leave you at the end of --
 (19) that you would leave the First Lady at the end of your term
 (20) and come be with Ms. Lewinsky, do you have any reason to
 (21) doubt him that it was on that night that that conversation
 (22) happened?
 (23) A All I can tell you, sir, is I, I certainly don't
 (24) remember him saying that. Now, he could have said that
 (25) because, as you know, a great many things happened in the

Page 65

(1) ensuing two or three days. And I could have just forgotten
 (2) it. But I don't remember him ever saying that.
 (3) Q At any time?
 (4) A No, I don't remember him saying that. What I
 (5) remember was that he said that Monica came to see him, that
 (6) she was upset that she was going to have to testify, that he
 (7) had referred her to a lawyer.
 (8) Q In fact, she was very distraught about the
 (9) subpoena, according to Mr. Jordan, wasn't she?
 (10) A Well, he said she was upset about it. I don't
 (11) remember -- I don't remember any, at any time when he said
 (12) this, this other thing you just quoted me. I'm sorry. I
 (13) just don't remember that.
 (14) Q That is something that one would be likely to
 (15) remember, don't you think, Mr. President?
 (16) A I think I would, and I'd be happy to share it with
 (17) you if I did. I only had one encounter with Ms. Lewinsky, I
 (18) seem to remember, which was somewhat maybe reminiscent of
 (19) that. But not that, if you will, obsessive, if that's the
 (20) way you want to use that word.
 (21) Q Do you recall him at all telling you that he was
 (22) concerned about her fascination with you, even if you don't
 (23) remember the specific conversation about you leaving the
 (24) First Lady?
 (25) A I recall him saying he thought that she was upset

Page 66

(1) with -- somewhat fixated on me, that she acknowledged that
 (2) she was not having a sexual relationship with me, and that
 (3) she did not want to be drug into the Jones lawsuit. That's
 (4) what I recall. And I recall his getting, saying that he had
 (5) recommended a lawyer to her and she had gone to see the
 (6) lawyer. That's what I recall.
 (7) I don't remember the other thing you mentioned. I
 (8) just -- I might well remember it if he had said it. Maybe he
 (9) said it and I've forgotten it, but I don't -- I can't tell
 (10) you that I remember that.
 (11) Q Mr. President, you swore under oath in the Jones
 (12) case that you didn't think anyone other than your lawyers had
 (13) ever told you that Monica Lewinsky had been subpoenaed. Page
 (14) 68, line 22 [sic] through page 69, line 3. Here's the
 (15) testimony, sir.
 (16) Question -- we've gone over it a little bit before:
 (17) "Did anyone other than your attorneys ever tell you that
 (18) Monica Lewinsky had been served with a subpoena in this
 (19) case?" Answer, "I don't think so."
 (20) Now, this deposition was taken just three and a
 (21) half weeks after, by your own testimony, Vernon Jordan made a
 (22) trip at night to the White House to tell you, among other
 (23) things, that Monica Lewinsky had been subpoenaed and was
 (24) upset about it. Why did you give that testimony under oath
 (25) in the Jones case, sir?

Page 67

(1) A Well, Mr. Wisenberg, I think you have to -- again,
 (2) you have to put this in the context of the flow of questions,
 (3) and I've already testified to this once today. I will
 (4) testify to it again.
 (5) My answer to the next question, I think, is a way
 (6) of finishing my answer to the question and the answer you've
 (7) said here. I was trying to remember who the first person,
 (8) other than Mr. Bennett -- I don't think Mr. Bennett -- who
 (9) the first person told me that, who told me Paula Jones had, I
 (10) mean, excuse me, Monica Lewinsky had a subpoena. And I
 (11) thought that Bruce Lindsey was the first person. And that's
 (12) how I was trying to remember that.
 (13) Keep in mind, sort of like today, these questions
 (14) are being kind of put at me rapid-fire. But, unlike today, I
 (15) hadn't had the opportunity to prepare at this level of
 (16) detail. I didn't -- I was trying to keep a lot of things in
 (17) my head that I had remembered with regard to the Paula Jones
 (18) case and the Kathleen Willey matter, because I knew I would
 (19) be asked about them. And I gave the best answers I could.
 (20) Several of my answers are somewhat jumbled.
 (21) But this is an honest attempt here -- if you read
 (22) both these answers, it's obvious they were both answers to
 (23) that question you quoted, to remember the first person, who
 (24) was not Mr. Bennett, who told me. And I don't believe Vernon
 (25) was the first person who told me. I believe Bruce Lindsey

Page 68

[1] was.
 [2] Q Let me read the question, because I want to talk
 [3] about the first person issue. The question on line 25 of
 [4] page 68 is, "Did anyone other than your attorneys ever tell
 [5] you that Monica Lewinsky had been served with a subpoena in
 [6] this case?" Answer, "I don't think so."
 [7] You would agree with me, sir, that the question
 [8] doesn't say, the question doesn't say anything about who was
 [9] the first person. It just says, did anyone tell you. Isn't
 [10] that correct?
 [11] A That's right. And I said Bruce Lindsey, because I
 [12] was trying to struggle with who -- where I had heard this.
 [13] And they were free to ask a follow-up question, and they
 [14] didn't.
 [15] Q Mr. President, three and a half weeks before, Mr.
 [16] Jordan had made a special trip to the White House to tell you
 [17] Ms. Lewinsky had been subpoenaed; she was distraught; she had
 [18] a fixation over you. And you couldn't remember that, three
 [19] and a half weeks later?
 [20] A Mr. Wisconsin, if -- they had access to all this
 [21] information from their conversations with Linda Tripp, if
 [22] that was the basis of it. They were free to ask me more
 [23] questions. They may have been trying to trick me.
 [24] Now, they knew more about the details of my
 [25] relationship with Monica Lewinsky. I'm not sure everything

Page 69

[1] they knew was true, because I don't know. I've not heard
 [2] these tapes or anything. But they knew a lot more than I
 [3] did. And instead of trying to trick me, what they should
 [4] have done is to ask me specific questions, and I invited them
 [5] on more than one occasion to ask follow-up questions.
 [6] This is the third or fourth time that you seem to
 [7] be complaining that I did not do all their work for them.
 [8] That just sitting here answering these questions to the best
 [9] of my memory, with limited preparation, was not enough. That
 [10] I should have actually been doing all their work for them.
 [11] Now, they'd been up all night with Linda Tripp, who
 [12] had betrayed her friend, Monica Lewinsky, stabbed her in the
 [13] back and given them all this information. They could have
 [14] helped more. If they wanted to ask me follow-up questions,
 [15] they could. They didn't. I'm sorry. I did the best I
 [16] could.
 [17] Q Can you tell the grand jury what is tricky about
 [18] the question, "Did anyone other than your attorneys ever tell
 [19] you" --
 [20] A No, there's nothing -- I'm just telling -- I have
 [21] explained. I will now explain for the third time, sir. I
 [22] was being asked a number of questions here. I was struggling
 [23] to remember then. There were lots of things that had gone on
 [24] during this time period that had nothing to do with Monica
 [25] Lewinsky.

Page 70

[1] You know, I believed then, I believe now that
 [2] Monica Lewinsky could have sworn out an honest affidavit,
 [3] that under reasonable circumstances, and without the benefit
 [4] of what Linda Tripp did to her, would have given her a chance
 [5] not to be a witness in this case.
 [6] So, I didn't have perfect memory of all these
 [7] events that have now, in the last seven months, since Ms.
 [8] Lewinsky was kept for several hours by four or five of your
 [9] lawyers and four or five FBI agents, as if she were a serious
 [10] felon, these things have become the most important matters in
 [11] the world. At the moment they were occurring, many other
 [12] things were going on.
 [13] I honestly tried to remember when -- you know, if
 [14] somebody asked you, has anybody ever talked to you about
 [15] this, you normally think, well, where was the first time I
 [16] heard that. That's all I was trying to do here. I was not
 [17] trying to say not Vernon Jordan, but Bruce Lindsey.
 [18] Everybody knows Vernon Jordan is a friend of mine. I
 [19] probably would have talked to Vernon Jordan about the Monica
 [20] Lewinsky problem if he had never been involved in it. So, I
 [21] was not trying to mislead them. I was trying to answer this
 [22] question with the first person who told me that.
 [23] Now, I realize that wasn't the specific question.
 [24] They were free to ask follow-ups, just like you're asking
 [25] follow-ups today. And I can't explain why I didn't answer

Page 71

[1] every question in the way you seem to think I should have,
 [2] and I certainly can't explain why they didn't ask what seemed
 [3] to me to be logical follow-ups, especially since they spent
 [4] all that time with Linda Tripp the night before.
 [5] Q You've told us that you understand your obligation
 [6] then, as it is now, is to tell the whole truth, sir. Do you
 [7] recall that?
 [8] A I took the oath here.
 [9] Q If Vernon Jordan --
 [10] A You even read me a definition of the oath.
 [11] Q If Vernon Jordan has told us that you have an
 [12] extraordinary memory, one of the greatest memories he's ever
 [13] seen in a politician, would that be something you would care
 [14] to dispute?
 [15] A No, I do have a good memory. At least, I have had
 [16] a good memory in my life.
 [17] Q Do you understand that if you answered, "I don't
 [18] think so", to the question, has anyone other than your
 [19] attorneys told you that Monica Lewinsky has been served with
 [20] a subpoena in this case, that if you answered, "I don't think
 [21] so", but you really knew Vernon Jordan had been telling you
 [22] all about it, you understand that that would be a false
 [23] statement, presumably perjurious?
 [24] A Mr. Wisconsin, I have testified about this three
 [25] times. Now, I will do it the fourth time. I am not going to

Page 72

[1] answer your trick questions.
 [2] I -- people don't always hear the same questions in
 [3] the same way. They don't always answer them in the same way.
 [4] I was so concerned about the question they asked me that the
 [5] next question I was asked, I went back to the previous
 [6] question, trying to give an honest answer about the first
 [7] time I heard about the Lewinsky subpoena.
 [8] I -- look. I could have had no reasonable
 [9] expectation that anyone would ever know that, that -- or not,
 [10] excuse me, not know if this thing -- that I would talk to
 [11] Vernon Jordan about nearly everything. I was not interested
 [12] in -- if the implication of your question is that somehow I
 [13] didn't want anybody to know I had ever talked to Vernon
 [14] Jordan about this, that's just not so.
 [15] It's also -- if I could say one thing about my
 [16] memory. I have been blessed and advantaged in my life with a
 [17] good memory. Now, I have been shocked, and so have members
 [18] of my family and friends of mine, at how many things that I
 [19] have forgotten in the last six years, I think because of the
 [20] pressure and the pace and the volume of events in the
 [21] President's life, compounded by the pressure of your four-
 [22] year inquiry, and all the other things that have happened,
 [23] I'm amazed there are lots of times when I literally can't
 [24] remember last week.
 [25] If you ask me, did you talk to Vernon -- when was

Page 73

[1] the last time you talked to Vernon Jordan, what time of day
 [2] was it, when did you see him, what did you say, my answer was
 [3] the last -- you know, if you answered [sic] me, when was the
 [4] last time you saw a friend of yours in California, if you
 [5] asked me a lot of questions like that, my memory is not what
 [6] it was when I came here, because my life is so crowded.
 [7] And now that -- as I said, you have made this the
 [8] most important issue in America. I mean, you have made it
 [9] the most important issue in America from your point of view.
 [10] At the time this was occurring, even though I was concerned
 [11] about it, and I hoped she didn't have to testify, and I hoped
 [12] this wouldn't come out, I felt -- I will say again -- that
 [13] she could honestly fill out an affidavit that, under
 [14] reasonable circumstances, would relieve her of the burden of
 [15] testifying.
 [16] I am not trying to exclude the fact that I talked
 [17] to Vernon here. I just -- all I can tell you is I believe
 [18] this answer reflects I was trying to remember the first
 [19] person who told me who was not Mr. Bennett, and I believe it
 [20] was Bruce Lindsey.
 [21] Q As you yourself recalled, just recalled, Mr.
 [22] President, Vernon Jordan not only discussed the subpoena with
 [23] you that night, but discussed Frank Carter, the lawyer he had
 [24] gotten for Ms. Lewinsky. And also Mr. Jordan discussed with
 [25] you over the next few weeks, after the 19th of December, in

Page 74

(1) addition to the job aspects of Ms. Lewinsky's job, he
 (2) discussed with you her affidavit that she was preparing in
 (3) the case. Is that correct, sir?
 (4) A I believe that he did notify us, I think, when she
 (5) signed her affidavit. I have a memory of that. Or it seems
 (6) like he said that she had signed her affidavit.
 (7) Q If he's told us that he notified you around January
 (8) 7th, when she signed her affidavit, and that you generally
 (9) understood that it would deny a sexual relationship, do you
 (10) have any reason to doubt that?
 (11) A No.
 (12) Q So, that's the affidavit, the lawyer, and the
 (13) subpoena. And yet when you were asked, sir, at the Jones
 (14) deposition about Vernon Jordan, and specifically about
 (15) whether or not he had discussed the lawsuit with you, you
 (16) didn't reveal that to the Court.
 (17) I want to refer you to page 72, line 16. It's
 (18) somewhat. It's going to go down, it might go down
 (19) somewhat.
 (20) Line 16. Question, "Has it ever been reported to
 (21) you that he" -- and that's referring to Mr. Jordan. At line
 (22) 12 you were asked, "You know a man named Vernon Jordan?", and
 (23) you answer, "I know him well."
 (24) Going down to 16, "Has it ever been reported to you
 (25) that he met with Monica Lewinsky and talked about this case?"

Page 75

(1) This is your answer, or a portion of it: "I knew that he met
 (2) with her. I think Betty suggested that he meet with her.
 (3) Anyway, he met with her. I, I thought that he talked to her
 (4) about something else."
 (5) Why didn't you tell the Court, when you were under
 (6) oath and sworn to tell the truth, the whole truth, and
 (7) nothing but the truth, that you had been talking with Vernon
 (8) Jordan about the case, about the affidavit, the lawyer, the
 (9) subpoena?
 (10) A Well, that's not the question I was asked. I was
 (11) not asked any question about -- I was asked, "Has it ever
 (12) been reported to you that he met with Monica Lewinsky and
 (13) talked about this case." I believe -- I may be wrong about
 (14) this -- my impression was that at the time, I was focused on
 (15) the meetings. I believe the meetings he had were meetings
 (16) about her moving to New York and getting a job.
 (17) I knew at some point that she had told him that she
 (18) needed some help, because she had gotten a subpoena. I'm not
 (19) sure I know whether she did that in a meeting or a phone
 (20) call. And I was not, I was not focused on that.
 (21) I know that, I know Vernon helped her to get a
 (22) lawyer, Mr. Carter. And I, I believe that he did it after
 (23) she had called him, but I'm not sure. But I knew that the
 (24) main source of their meetings was about her move to New York
 (25) and her getting a job.

Page 76

(1) Q Are you saying, sir, that you forgot when you were
 (2) asked this question that Vernon Jordan had come on December
 (3) 19th, just three and a half weeks before, and said that he
 (4) had met that day, the day that Monica got the subpoena?
 (5) A It's quite possible -- it's a sort of a jumbled
 (6) answer. It's quite possible that I had gotten mixed up
 (7) between whether she had met with him or talked to him on the
 (8) telephone in those three and a half weeks.
 (9) Again, I say, sir, just from the tone of your voice
 (10) and the way you are asking questions here, it's obvious that
 (11) this is the most important thing in the world, and that
 (12) everybody was focused on all the details at the time. But
 (13) that's not the way it worked. I was, I was doing my best to
 (14) remember.
 (15) Now, keep in mind, I don't know if this is true,
 (16) but the news reports are that Linda Tripp talked to you, then
 (17) went and talked to the Jones lawyers, and, you know, that she
 (18) prepared them for this. Now, maybe -- you seem to be
 (19) criticizing me because they didn't ask better questions and,
 (20) as if you didn't prepare them well enough to sort of set me
 (21) up or something. I don't know what's going on here.
 (22) All I can tell you is I didn't remember all the
 (23) details of all this. I didn't remember what -- when Vernon
 (24) talked to me about Monica Lewinsky, whether she talked to him
 (25) on the telephone or had a meeting. I didn't remember all

Page 77

(1) those details. I was focused on the fact that Monica went to
 (2) meet with Vernon after Betty helped him set it up, and had
 (3) subsequent meetings to talk about her move to New York.
 (4) Now, keep in mind at this time, at this time, until
 (5) this date here when it's obvious that something funny's going
 (6) on here and there's some sort of a gotcha game at work in
 (7) this deposition, until this date, I didn't know that Ms.
 (8) Lewinsky's deposition [sic] wasn't going to be sufficient for
 (9) her to avoid testifying. I didn't, you know --
 (10) MR. KENDALL: Excuse me, Mr. President, I think --
 (11) THE WITNESS: So, all these details --
 (12) MR. KENDALL: -- you mean her affidavit.
 (13) BY MR. WISENBERG:
 (14) Q You mean her affidavit?
 (15) A Excuse me. I'm sorry. Her affidavit. Thank you.
 (16) So, I don't necessarily remember all the details of
 (17) all these questions you're asking me, because there was a lot
 (18) of other things going on, and at the time they were going on,
 (19) until all this came out, this was not the most important
 (20) thing in my life. This was just another thing in my life.
 (21) Q But Vernon Jordan met with you, sir, and he
 (22) reported that he had met with Monica Lewinsky, and the
 (23) discussion was about the lawsuit, and you didn't inform,
 (24) under oath, the Court of that in your deposition?
 (25) A I gave the best answer I could, based on the best

Page 78

(1) memory I had at the time they asked me the question. That's
 (2) the only answer I can give you, sir.
 (3) Q And before --
 (4) A And I think I may have been confused in my memory,
 (5) because I've also talked to him on the phone about what he
 (6) said about whether he talked to her or met with her. That's
 (7) all I can tell you.
 (8) But, let me say again, I don't have the same view
 (9) about this deposition -- I mean, this affidavit -- that I
 (10) think you do. I felt very strongly that Ms. Lewinsky and
 (11) everybody else that didn't know anything about Paula Jones
 (12) and anything about sexual harassment, that she and others
 (13) were themselves being harassed for political purposes, in the
 (14) hope of getting damaging information that the Jones lawyers
 (15) could unlawfully leak.
 (16) Now, I believed then, I believe today, that she
 (17) could execute an affidavit which, under reasonable
 (18) circumstances with fair-minded, non politically-oriented
 (19) people, would result in her being relieved of the burden to
 (20) be put through the kind of testimony that, thanks to Linda
 (21) Tripp's work with you and with the Jones lawyers, she would
 (22) have been put through. I don't think that's dishonest. I
 (23) don't think that's illegal. I think what they were trying to
 (24) do to her and all these other people, who knew nothing about
 (25) sexual harassment, was outrageous, just so they could hurt me

Page 79

(1) politically.
 (2) So, I just don't have the same attitude about it
 (3) that you do.
 (4) Q Well, you're not telling our grand jurors that
 (5) because you think the case was a political case or a setup,
 (6) Mr. President, that that would give you the right to commit
 (7) perjury or --
 (8) A No, sir.
 (9) -- not to tell the full truth?
 (10) A No, sir. In the face of that, the Jones lawyers,
 (11) the people that were questioning me, in the face of their
 (12) illegal leaks, their constant, unrelenting illegal leaks in a
 (13) lawsuit that I knew and, by the time this deposition and this
 (14) discovery started, they knew was a bogus suit on the law and
 (15) a bogus suit on the facts.
 (16) Q The question is --
 (17) A In the face of that, I knew that in the face of
 (18) their illegal activity, I still had to behave lawfully. But
 (19) I wanted to be legal without being particularly helpful. I
 (20) thought that was, that was what I was trying to do. And this
 (21) is the first -- you are the first persons who ever suggested
 (22) to me that, that I should have been doing their lawyers' work
 (23) for them, when they were perfectly free to ask follow-up
 (24) questions. On one or two occasions, Mr. Bennett invited them
 (25) to ask follow-up questions.

Page 80

(1) It now appears to me they didn't because they were
 (2) afraid I would give them a truthful answer, and that there
 (3) had been some communication between you and Ms. Tripp and
 (4) them, and they were trying to set me up and trick me. And
 (5) now you seem to be complaining that they didn't do a good
 (6) enough job.
 (7) I did my best, sir, at this time. I did not know
 (8) what I now know about this. A lot of other things were going
 (9) on in my life. Did I want this to come out? No. Was I
 (10) embarrassed about it? Yes. Did I ask her to lie about it?
 (11) No. Did I believe there could be a truthful affidavit?
 (12) Absolutely.
 (13) Now, that's all I know to say about this. I will
 (14) continue to answer your questions as best I can.
 (15) Q You're not going back on your earlier statement
 (16) that you understood you were sworn to tell the truth, the
 (17) whole truth, and nothing but the truth to the folks at that
 (18) deposition, are you, Mr. President?
 (19) A No, sir, but I think we might as well put this out
 (20) on the table. You tried to get me to give a broader
 (21) interpretation to my oath than just my obligation to tell the
 (22) truth. In other words, you tried to say, even though these
 (23) people are treating you in an illegal manner in illegally
 (24) leaking these depositions, you should be a good lawyer for
 (25) them. And if they don't have enough sense to write - to ask

Page 81

(1) a question, and even if Mr. Bennett invited them to ask
 (2) follow-up questions, if they didn't do it, you should have
 (3) done all their work for them.
 (4) Now, so I will admit this, sir. My goal in this
 (5) deposition was to be truthful, but not particularly helpful.
 (6) I did not wish to do the work of the Jones lawyers.
 (7) I deplored what they were doing. I deplored the innocent
 (8) people they were tormenting and traumatizing. I deplored
 (9) their illegal leaking. I deplored the fact that they knew,
 (10) once they knew our evidence, that this was a bogus lawsuit,
 (11) and that because of the funding they had from my political
 (12) enemies, they were putting ahead. I deplored it.
 (13) But I was determined to walk through the mine field
 (14) of this deposition without violating the law, and I believe I
 (15) did.
 (16) Q You are not saying, are you, Mr. President, in
 (17) terms of doing the work for the Jones folks, the Jones
 (18) lawyers, that you could, you could say, as part of your not
 (19) helping them, "I don't know" to a particular question, when
 (20) you really knew, and that it was up to them - even if you
 (21) really knew the answer, it was up to them to do the follow-
 (22) up, that you kind of had a one free "I don't know" -
 (23) A No, sir.
 (24) Q If I could finish up? I've been very patient, Mr.
 (25) President, in letting you finish.

Page 82

(1) You didn't think you had a free shot to say, "I
 (2) don't know", or "I don't recall", but when you really did
 (3) know and you did recall, and it was just up to them, even if
 (4) you weren't telling the truth, to do a follow-up and to catch
 (5) you?
 (6) A No, sir, I'm not saying that. And if I could give
 (7) you one example? That's why I felt that I had to come back
 (8) to that question where I said, I don't know that, and talk
 (9) about Bruce Lindsey, because I was trying, I was honestly
 (10) trying to remember how I had first heard this. I wasn't hung
 (11) up about talking about this.
 (12) All I'm saying is, the - let me say something
 (13) sympathetic to you. I've been pretty tough. So, let me say
 (14) something sympathetic.
 (15) All of you are intelligent people. You've worked
 (16) hard on this. You've worked for a long time. You've gotten
 (17) all the facts. You've seen a lot of evidence that I haven't
 (18) seen. And it's, it's an embarrassing and personally painful
 (19) thing, the truth about my relationship with Ms. Lewinsky.
 (20) So, the natural assumption is that while all this
 (21) was going on, I must have been focused on nothing but this;
 (22) therefore, I must remember everything about it in the
 (23) sequence and form in which it occurred. All I can tell you
 (24) is, I was concerned about it. I was glad she saw a lawyer.
 (25) I was glad she was doing an affidavit. But there were a lot

Page 83

(1) of other things going on, and I don't necessarily remember it
 (2) all. And I don't know if I can convince you of that.
 (3) But I tried to be honest with you about my mindset,
 (4) about this deposition. And I'm just trying to explain that I
 (5) don't have the memory that you assume that I should about
 (6) some of these things.
 (7) Q I want to talk to you for a bit, Mr. President,
 (8) about the incident that happened at the Northwest Gate of the
 (9) White House on December 5th - sorry, December 6th, 1997. If
 (10) you would give me just a moment?
 (11) That was a - let me ask you first. In early
 (12) nineteen - in early December 1997, the Paula Jones case was
 (13) pending, correct?
 (14) A Yes, sir.
 (15) Q You were represented by Mr. Bennett, of course?
 (16) A That's correct.
 (17) Q In that litigation?
 (18) A Yes, I did.
 (19) Q How -
 (20) A He was.
 (21) Q I'm sorry. Go ahead.
 (22) A No, no. Yes, he was representing me.
 (23) Q How often did you talk to him or meet with him, if
 (24) you can just recall, at that time in the litigation?
 (25) A Well, we met, I would say - I wish Mr. Ruff were

Page 84

(1) answering this question, instead of me. His memory would be
 (2) better. We met probably, oh, for a long time we didn't meet
 (3) all that often, maybe once a month. And then the closer we
 (4) got to the deposition, we would meet more frequently. So,
 (5) maybe by this time we were meeting more.
 (6) We also - there was a period when we had been
 (7) approached about -
 (8) MR. KENDALL: Again, the question only goes to the
 (9) number of meetings and not the content of any conversations
 (10) with your lawyer.
 (11) THE WITNESS: I understand. We're not talking
 (12) about the content.
 (13) There was a, there was a period in which we, I
 (14) think back in the summer before this, when we had met more
 (15) frequently. But I would say normally once a month.
 (16) Sometimes something would be happening and we'd meet more.
 (17) And then, as we moved toward the deposition, we would begin
 (18) to meet more.
 (19) BY MR. WISENBERG:
 (20) Q A witness list came out on December 5th of 1997,
 (21) with Monica Lewinsky's name on it. Mr. President, when did
 (22) you find out that Monica's name was on that witness list?
 (23) A I believe that I found out late in the afternoon on
 (24) the 6th. That's what I believe. I've tried to remember with
 (25) great precision, and because I thought you would ask me about

Page 85

(1) this day, I've tried to remember the logical question, which
 (2) is whether, whether I knew it on the 6th and, if so, at what
 (3) time.
 (4) I don't - I had a meeting in the late afternoon on
 (5) the 5th, on the 6th - excuse me, on the 6th - and I believe
 (6) that's when I learned about it.
 (7) Q Now, on the morning of the 6th, Monica Lewinsky
 (8) came to the Northwest Gate and found out that you were being
 (9) visited by Eleanor Mondale at the time, and had an extremely
 (10) angry reaction. You know that, sir, now, don't you?
 (11) A I have, I have - I know that Monica Lewinsky came
 (12) to the gate on the 6th and apparently directly called in and
 (13) wanted to see me and couldn't, and was angry about it. I
 (14) know that.
 (15) Q And she expressed that anger to Betty Currie over
 (16) the telephone, isn't that correct, sir?
 (17) A That, Betty told me that.
 (18) Q And she then later expressed her anger to you in
 (19) one of her telephone conversations with Betty Currie, is that
 (20) correct?
 (21) A You mean did I talk to her on the phone?
 (22) Q Monica Lewinsky, that day, before she came in to
 (23) visit in the White House?
 (24) A Mr. Wisenberg, I remember that she came in to visit
 (25) that day. I remember that she was upset. I don't recall

Page 86

(1) whether I talked to her on the phone before she came in to
 (2) visit, but I well may have. I'm not denying it that I did.
 (3) I just don't recall that.
 (4) Q And Mrs. Currie and yourself were very irate that
 (5) Ms. Lewinsky had overheard that you were in the Oval Office
 (6) with a visitor on that day, isn't that correct, that you and
 (7) Mrs. Currie were very irate about that?
 (8) A Well, I don't remember all that. What I remember
 (9) is that she was very -- Monica was very upset. She got upset
 (10) from time to time. And, and I was, you know, I couldn't see
 (11) her. I had, I was doing, as I remember, I had some other
 (12) work to do that morning and she had just sort of showed up
 (13) and wanted to be let in, and wanted to come in at a certain
 (14) time and she wanted everything to be that way, and we
 (15) couldn't see her. Now, I did arrange to see her later that
 (16) day. And I was upset about her conduct.
 (17) I'm not sure that I knew or focused on at that
 (18) moment exactly the question you asked. I remember I was, I
 (19) thought her conduct was inappropriate that day.
 (20) Q I want to go back and I want to take them one at a
 (21) time. Number one, did you find out at some point during that
 (22) day that Monica had overheard from somebody in the Secret
 (23) Service that you were meeting with Ms. Mondale, and that
 (24) Monica got very irate about that?
 (25) A I knew that at some point. I don't know whether I

Page 87

(1) found out that, that day. I knew that day, I knew that
 (2) somehow she knew that among, that, that Eleanor Mondale was
 (3) in to see us that day. I knew that. I don't know that I
 (4) knew how she knew that on that day. I don't remember that.
 (5) Q That leads into my second question, which is,
 (6) weren't you irate at the Secret Service precisely because
 (7) they had revealed this information to Ms. Lewinsky on that
 (8) very day, so irate that you told several people, or at least
 (9) one person, that somebody should be fired over this, on that
 (10) very day?
 (11) A I don't remember whether it happened on that very
 (12) day. But, let me tell you that the Uniformed Secret Service,
 (13) if that is in fact what happened and I will stipulate that
 (14) that is, that no one should be telling anybody, not anybody,
 (15) not a member of my staff, who the President is meeting with.
 (16) That's an inappropriate thing to do.
 (17) So, I would think that if that, in fact, is what I
 (18) heard when I heard it, I would have thought that was a bad
 (19) thing. I don't know that I said that. I don't, I don't
 (20) remember what I said, and I don't remember to whom I said it.
 (21) Q It would be an inappropriate thing, sir, and that
 (22) leads into my next question is that why did Mrs. Currie, on
 (23) your instructions, later that day tell many of the Secret
 (24) Service Officers involved that it never happened, to forget
 (25) about it?

Page 88

(1) A That what never happened?
 (2) Q The incident that you were so irate about earlier,
 (3) the incident of somebody disclosing to Ms. Lewinsky that Ms.
 (4) Mondale was in the Oval Office?
 (5) A I don't know the answer to that. I think maybe,
 (6) you know, I don't know. I don't know the answer.
 (7) Q You don't recall that you later gave orders to the
 (8) effect that we are going to pretend this never happened, or
 (9) something --
 (10) A No, sir.
 (11) Q -- like that?
 (12) A No, sir. I don't recall it. First of all, I don't
 (13) recall that I gave orders to fire anybody, if that was the
 (14) implication of your first statement.
 (15) Q It wasn't an implication. Actually, the question
 (16) was that you initially wanted somebody fired. You were so
 (17) mad that you wanted somebody fired.
 (18) A I don't remember that, first of all. I remember
 (19) thinking it was an inappropriate thing to do. And I, I, I
 (20) remember, as I usually do when I'm mad, after awhile I wasn't
 (21) so mad about it, and I'm quite aware that Ms. Lewinsky has a
 (22) way of getting information out of people when she's either
 (23) charming or determined. And it -- I could have just said,
 (24) well, I'm not so mad about it any more.
 (25) But I don't remember the whole sequence of events

Page 89

(1) you're talking to me about now, except I do remember that
 (2) somehow Monica found out Eleanor Mondale was there. I
 (3) learned either that day or later that one of the Uniformed
 (4) Division personnel had told her. I do -- I thought then it
 (5) was a mistake. I think now it was a mistake. I'm not sure
 (6) it's a mistake someone should be terminated over. I think
 (7) that, you know, you could just tell them not to do that any
 (8) more.
 (9) Q In fact, it would kind of be an overreaction, to
 (10) get irate or terminate somebody for revealing to a former
 (11) White House staffer who visits where the President is, don't
 (12) you think, sir?
 (13) A Well, it would depend upon the facts. I think on
 (14) the whole people in the Uniformed Secret Service who are
 (15) working on the gate have no business telling anybody anything
 (16) about the President's schedule, just as a general principal.
 (17) I didn't mind anybody knowing that she was there, if that's
 (18) what you're saying. I could care less about that. But I
 (19) think that the schedule itself -- these uniformed people, you
 (20) know, somebody shouldn't just be able to come up on the
 (21) street and, because they know who the Secret Service agent
 (22) is, he says who the President's with. I don't think that's
 (23) proper.
 (24) Q I agree, Mr. President.
 (25) A But, on the other hand, I didn't, you know, I, I

Page 90

(1) wanted to know what happened. I think we found out what
 (2) happened. And then they were, I think, told not to let it
 (3) happen again, and I think that's the way it should have been
 (4) handled. I think it was handled in the appropriate way.
 (5) Q You have no knowledge of the fact that Secret
 (6) Service officers were told later in the day something to the
 (7) effect of, this never happened, this event never happened?
 (8) You have no knowledge of that?
 (9) A I'm not sure anybody ever told that to me. I mean,
 (10) I thought you were asking -- let me just say, my
 (11) interpretation of this, of your previous question was
 (12) different than what you're asking now.
 (13) What I remember was being upset that this matter
 (14) would be discussed that -- by anybody. It's incidental it
 (15) happened to be Monica Lewinsky. And that, that whatever I
 (16) said, I don't recall. But then thinking that the appropriate
 (17) thing to do was to say, look, just this, this is not an
 (18) appropriate thing for you to be talking about, the
 (19) President's schedule, and it shouldn't happen again.
 (20) Now, the question you seem to be asking me now -- I
 (21) just want to be sure I'm getting the right question -- is
 (22) whether I gave instructions, in effect, to pretend that
 (23) Monica Lewinsky was never at the gate. And if --
 (24) Q To the effect of pretend --
 (25) A And if that is the question you are asking me, I

Page 91

(1) don't believe I ever did that, sir. I certainly have no
 (2) memory of doing that.
 (3) Q Or anything to that effect?
 (4) A I don't know what that means.
 (5) Q Is that your testimony?
 (6) A What does that mean, anything to that effect?
 (7) Q Well, Mr. President, you've told us that you were
 (8) not going to try to help the Jones attorneys, and I think
 (9) it's clear from your testimony that you were pretty literal
 (10) at times. So, that's why I'm saying, I don't necessarily
 (11) know the exact words. The question was, do you have any
 (12) knowledge of the fact --
 (13) A Of that?
 (14) Q -- of the fact that later in the day, on Saturday,
 (15) the 6th of December, 1997, Secret Service people were then,
 (16) were told something to this effect: This event never
 (17) happened, let's just pretend this event did not happen. Do
 (18) you have knowledge of it, or not?
 (19) A No, sir. And I, I didn't instruct the Secret
 (20) Service in that regard. I have no memory of saying anything
 (21) to anybody in the Secret Service that would have triggered
 (22) that kind of instruction.
 (23) Q Did you tell Captain Purdy, while you were standing
 (24) in the doorway between the Oval Office and Betty Currie's
 (25) office, did you tell Captain Purdy of the Uniformed Division,

Page 92

(1) I hope I can count on your discretion in this matter? At the
 (2) end of the day when you all were talking about that earlier
 (3) incident, did you tell him that or anything like that, sir?
 (4) A I don't remember anything I said to him in that
 (5) regard. I have no recollection of that whatever.
 (6) MR. WISENBERG: Let's take a break now.
 (7) MR. KENDALL: Thank you, 3:38.
 (8) (Whereupon, the proceedings were recessed from 3:38 p.m.
 (9) until 4:01 p.m.)
 (10) MR. KENDALL: It is 4:01.
 (11) BY MR. WISENBERG:
 (12) Q Mr. President, the next series of questions are
 (13) from the grand jurors. And let me tell you that the grand
 (14) jurors want you to be more specific about the inappropriate
 (15) conduct.
 (16) The first question was, one of the grand jurors has
 (17) said that you referred to what you did with Ms. Lewinsky as
 (18) inappropriate contact; what do you mean by that?
 (19) A I mean just what I said. But I would like to ask
 (20) the grand jury, because I think I have been quite specific
 (21) and I think I've been willing to answer some specific
 (22) questions that I haven't been asked yet, but I do not want to
 (23) discuss something that is intensely painful to me. This has
 (24) been tough enough already on me and on my family, although I
 (25) take responsibility for it. I have no one to blame but myself.

Page 93

(1) What I meant was, and what they can infer that I
 (2) meant was, that I did things that were -- when I was alone
 (3) with her, that were inappropriate and wrong. But that they
 (4) did not include any activity that was within the definition
 (5) of sexual relations that I was given by Judge Wright in the
 (6) deposition. I said that I did not do those things that were
 (7) in that, within that definition, and I testified truthfully
 (8) to that. And that's all I can say about it.
 (9) Now, you know, if there's any doubt on the part of
 (10) the grand jurors about whether I believe some kind of
 (11) activity falls within that definition or outside that
 (12) definition, I'd be happy to try to answer that.
 (13) Q Well, I have a question regarding your definition
 (14) then. And my question is, is oral sex performed on you
 (15) within that definition as you understood it, the definition
 (16) in the Jones --
 (17) A As I understood it, it was not, no.
 (18) Q The grand jurors would like to know upon what
 (19) basis, what legal basis you are declining to answer more
 (20) specific questions about this? I've mentioned to you that
 (21) obviously you have privileges, privileges against self-
 (22) incrimination. There's no general right not to answer
 (23) questions.
 (24) And so one of the questions from the grand jurors
 (25) is what basis, what legal basis are you declining to answer

Page 94

(1) these questions?
 (2) A I'm not trying to evade my legal obligations or my
 (3) willingness to help the grand jury achieve their legal
 (4) obligations. As I understand it, you want to examine whether
 (5) you believe I told the truth in my deposition, whether I
 (6) asked Ms. Lewinsky not to tell the truth, and whether I did
 (7) anything else with evidence, or in any other way, amounting
 (8) to an obstruction of justice or a subornation of perjury.
 (9) And I'm prepared to answer all questions that the grand jury
 (10) needs to draw that conclusion.
 (11) Now, respectfully, I believe the grand jurors can
 (12) ask me if I believe -- just like that grand juror did --
 (13) could ask me, do you believe that this conduct falls within
 (14) that definition. If it does, then you are free to conclude
 (15) that my testimony is that I didn't do that. And I believe
 (16) that you can achieve that without requiring me to say and do
 (17) things that I don't think are necessary and that I think,
 (18) frankly, go too far in trying to criminalize my private life.
 (19) Q If a person touched another person, if you touched
 (20) another person on the breast, would that be, in your view,
 (21) and was it within your view, when you took the deposition,
 (22) within the definition of sexual relations?
 (23) A If the person being deposed --
 (24) Q Yes.
 (25) A -- in this case, me, directly touched the breast of

Page 95

(1) another person, with the purpose to arouse or gratify, under
 (2) that definition that would be included.
 (3) Q Only directly, sir, or would it be directly or
 (4) through clothing?
 (5) A Well, I would -- I think the common sense
 (6) definition would be directly. That's how I would infer what
 (7) it means.
 (8) Q If the person being deposed kissed the breast of
 (9) another person, would that be in the definition of sexual
 (10) relations as you understood it when you were under oath in
 (11) the Jones case?
 (12) A Yes, that would constitute contact. I think that
 (13) would. If it were direct contact, I believe it would. I --
 (14) maybe I should read it again, just to make sure.
 (15) Because this basically says if there was any direct
 (16) contact with an intent to arouse or gratify, if that was the
 (17) intent of the contact, then that would fall within the
 (18) definition. That's correct.
 (19) Q So, touching, in your view then and now -- the
 (20) person being deposed touching or kissing the breast of
 (21) another person would fall within the definition?
 (22) A That's correct, sir.
 (23) Q And you testified that you didn't have sexual
 (24) relations with Monica Lewinsky in the Jones deposition, under
 (25) that definition, correct?

Page 96

(1) A That's correct, sir.
 (2) Q If the person being deposed touched the genitalia
 (3) of another person, would that be -- and with the intent to
 (4) arouse the sexual desire, arouse or gratify, as defined in
 (5) definition (1), would that be, under your understanding then
 (6) and now --
 (7) A Yes, sir.
 (8) Q -- sexual relations?
 (9) A Yes, sir.
 (10) Q Yes, it would?
 (11) A Yes, it would. If you had a direct contact with
 (12) any of these places in the body, if you had direct contact
 (13) with intent to arouse or gratify, that would fall within the
 (14) definition.
 (15) Q So, you didn't do any of those three things --
 (16) A You --
 (17) Q -- with Monica Lewinsky?
 (18) A You are free to infer that my testimony is that I
 (19) did not have sexual relations, as I understood this term to
 (20) be defined.
 (21) Q Including touching her breast, kissing her breast,
 (22) or touching her genitalia?
 (23) A That's correct.
 (24) Q Would you agree with me that the insertion of an
 (25) object into the genitalia of another person with the desire

Page 97

(1) to gratify sexually would fit within the definition used in
 (2) the Jones case as sexual relations?
 (3) A There's nothing here about that, is there? I don't
 (4) know that I ever thought about that one way or the other.
 (5) Q The question is, under the definition as you
 (6) understood it then, under the definition as you understand it
 (7) now -- pardon me just a minute.
 (8) Pardon me, Mr. President.
 (9) (Pause)
 (10) Deposition Exhibit 1, question 1, under the -- in
 (11) the Jones case, Definition of Sexual Relations --
 (12) MR. KENDALL: Do you have that before you, Mr.
 (13) President? Excuse me.
 (14) THE WITNESS: I do, sir.
 (15) MR. KENDALL: Good.
 (16) THE WITNESS: I've got it right here. I'm looking
 (17) at it.
 (18) BY MR. WISENBERG:
 (19) Q As you understood the definition then, and as you
 (20) understood it now, would it include sticking an object into
 (21) the genitalia of another person in order to arouse or gratify
 (22) the sexual desire of any person? Would it constitute, in
 (23) other words, contact with the genitalia?
 (24) A I don't know the answer to that. I suppose you
 (25) could argue that since section 2, paragraph (2) was

Page 98

[1] eliminated, and paragraph (2) actually dealt with the object
 [2] issue, that perhaps whoever wrote this didn't intend for
 [3] paragraph (1) to cover an object, and basically meant direct
 [4] contact.
 [5] So, if I were asked -- I've not been asked this
 [6] question before. But I guess that's the way I would read it.
 [7] Q If it -- that it would not be covered? That
 [8] activity would not be covered?
 [9] A That's right. If the activity you just mentioned
 [10] would be covered in number (2), and number (2) were stricken,
 [11] I think you can infer logically that paragraph (1) was not
 [12] intended to cover it. But, as I said, I've not been asked
 [13] this before. I'm just doing the best I can.
 [14] Q Well, if someone were to hold or a judge were to
 [15] hold that you are incorrect and that definition (1) does
 [16] include the hypo I've given to you -- because we're talking
 [17] in hypos, so that you don't -- under your request here, if
 [18] someone were to tell you or rule that you are wrong, that the
 [19] insertion of an object into somebody else's genitalia with
 [20] the intent to arouse or gratify the sexual desire of any
 [21] person is within definition (1) --
 [22] MR. KENDALL: Mr. Wisenberg, excuse me. I have not
 [23] objected heretofore to any question you've asked. I must
 [24] tell you, I cannot understand that question. I think it's
 [25] improper. And, if the witness can understand it, he may

Page 99

[1] answer.
 [2] MR. WISENBERG: I'll be happy to rephrase it.
 [3] BY MR. WISENBERG:
 [4] Q If you're wrong and it's within definition (1), did
 [5] you engage in sexual relations under the definition, with
 [6] Monica Lewinsky?
 [7] A But, Mr. Wisenberg, I have said all along that I
 [8] would say what I thought it meant, and you can infer that I
 [9] didn't. This is an unusual question, but it's a slippery
 [10] slope. We can -- I have tried to deal with some very
 [11] delicate areas here, and, in one case I've given you a
 [12] very forthright answer about what I thought was not within
 [13] here.
 [14] All I can tell you is, whatever I thought was
 [15] covered, and I thought about this carefully. And let me just
 [16] point out, this was uncomfortable for me. I had to
 [17] acknowledge, because of this definition, that under this
 [18] definition I had actually had sexual relations once with
 [19] Gennifer Flowers, a person who had spread all kinds of
 [20] ridiculous, dishonest, exaggerated stories about me for
 [21] money. And I knew when I did that, it would be leaked. It
 [22] was. And I was embarrassed. But I did it.
 [23] So, I tried to read this carefully. I can tell you
 [24] what I thought it covered, and I can tell you that I do not
 [25] believe I did anything that I thought was covered by this.

Page 100

[1] Q As I understand your testimony, Mr. President,
 [2] touching somebody's breast with the intent to arouse, with
 [3] the intent to arouse or gratify the sexual desire of any
 [4] person is covered; kissing the breast is covered; touching
 [5] the genitalia is covered; correct?
 [6] MR. KENDALL: In fairness, the witness said
 [7] directly in each one of those cases.
 [8] BY MR. WISENBERG:
 [9] Q Directly, is covered, correct?
 [10] A I believe it is, yes, sir.
 [11] Q Oral sex, in your view, is not covered, correct?
 [12] A If performed on the deponent.
 [13] Q Is not covered, correct?
 [14] A That's my reading of this number (1).
 [15] Q And you are declining to answer the hypothetical
 [16] about insertion of an object.
 [17] I need to inform you, Mr. President -- we'll go on,
 [18] at least for now. But I need to inform you that the grand
 [19] jury will consider your not answering the questions more
 [20] directly in their determination of whether or not they are
 [21] going to issue another subpoena.
 [22] Let me switch the topic and talk to you about John
 [23] Podesta and some of the other aides you've met with and spoke
 [24] to after this story became public on January 21st, 1998, the
 [25] day of The Washington Post story.

Page 101

[1] Do you recall meeting with him around January 23rd,
 [2] 1998, a Friday a.m. in your study, two days after The
 [3] Washington Post story, and extremely explicitly telling him
 [4] that you didn't have, engage in any kind of sex, in any way,
 [5] shape or form, with Monica Lewinsky, including oral sex?
 [6] A I meet with John Podesta almost every day. I meet
 [7] with a number of people. The only thing I -- what happened
 [8] in the couple of days after what you did was revealed, is a
 [9] blizzard to me. The only thing I recall is that I met with
 [10] certain people, and a few of them I said I didn't have sex
 [11] with Monica Lewinsky, or I didn't have an affair with her or
 [12] something like that. I had a very careful thing I said, and
 [13] I tried not to say anything else.
 [14] And it might be that John Podesta was one of them.
 [15] But I do not remember this specific meeting about which you
 [16] asked, or the specific comments to which you refer. And --
 [17] Q You don't remember --
 [18] A -- seven months ago, I'd have no way to remember.
 [19] no.
 [20] Q You don't remember denying any kind of sex in any
 [21] way, shape or form, and including oral sex, correct?
 [22] A I remember that I issued a number of denials to
 [23] people that I thought needed to hear them, but I tried to be
 [24] careful and to be accurate, and I do not remember what I said
 [25] to John Podesta.

Page 102

[1] Q Surely, if you told him that, that would be a
 [2] falsehood, correct?
 [3] A No, I didn't say that, sir. I didn't say that at
 [4] all. That is not covered by the definition and I did not
 [5] address it in my statement.
 [6] Q Well, let me ask you then. If you told him --
 [7] perhaps he thought it was covered, I don't know. But if you
 [8] told him, if you denied to him sex in any way, shape or form,
 [9] kind of similar to what Mr. Bennett did at the deposition,
 [10] including oral sex, wouldn't that have been a falsehood?
 [11] A Now, Mr. Wisenberg, I told you in response to a
 [12] grand juror's question, you asked me did I believe that oral
 [13] sex performed on the person being deposed was covered by that
 [14] definition, and I said no. I don't believe it's covered by
 [15] the definition.
 [16] I said you are free to conclude that I did not do
 [17] things that I believe were covered by the definition, and you
 [18] have asked me a number of questions and I have acknowledged
 [19] things that I believe are covered by the definition. Since
 [20] that was not covered by the definition, I want to fall back
 [21] on my statement.
 [22] Look, I'm not trying to be evasive here. I'm
 [23] trying to protect my privacy, my family's privacy, and I'm
 [24] trying to stick to what the deposition was about. If the
 [25] deposition wasn't about this and didn't cover it, then I

Page 103

[1] don't believe that I should be required to go beyond my
 [2] statement.
 [3] Q Mr. President, it's not our intent to embarrass
 [4] you. But since we have to look, among other things, at
 [5] obstruction of justice, questions of obstruction of justice
 [6] and perjury, the answer to some of these delicate and
 [7] unfortunate questions are absolutely required. And that is
 [8] the purpose that we have to ask them for.
 [9] A It's not --
 [10] Q I'm unaware of any --
 [11] A Mr. Wisenberg, with respect, you don't need to know
 [12] the answer for that, if the answer, no matter what the answer
 [13] is, wouldn't constitute perjury because it wasn't sexual
 [14] relations as defined by the Judge.
 [15] Q Mister --
 [16] A The only reason you need to know that is for some
 [17] other reason. It couldn't have anything to do with perjury.
 [18] Q Mr. President, one of the, one of the nice things
 [19] about -- one of the normal things about an investigation and
 [20] a grand jury investigation is that the grand jurors and the
 [21] prosecutors get to ask the questions unless they are
 [22] improper, and unless there is a legal basis.
 [23] As I understand from your answers, there is no
 [24] legal basis for which you decline to answer these questions.
 [25] And I'll ask you again to answer the question. I'm unaware

Page 104

[1] of any legal basis for you not to. If you told --
 [2] MR. KENDALL: Mr. Wisenberg, could you just restate
 [3] the question, please?
 [4] BY MR. WISENBERG:
 [5] Q The question is, if you told John Podesta two days
 [6] after the story broke something to this effect, that you
 [7] didn't have any kind of sex in any way, shape or form,
 [8] including oral sex with Ms. Lewinsky, were you telling him
 [9] the truth?
 [10] A And let me say again, with respect, this is an
 [11] indirect way to try to get me to testify to questions that
 [12] have no bearing on whether I committed perjury. You
 [13] apparently agree that it has no bearing --
 [14] Q Oh, I don't --
 [15] A -- no bearing on whether I --
 [16] Q I don't agree.
 [17] A -- committed perjury.
 [18] Q Mr. President, I'm sorry, with respect, I don't
 [19] agree with that. I'm not going to argue with you about it.
 [20] I just am going to ask you again, in fact direct you to
 [21] answer the question.
 [22] A I'm not going to answer that question, because I
 [23] believe it's a question about conduct that, whatever the
 [24] answer to it is, would, does not bear on the perjury because
 [25] oral sex performed on the deponent under this definition is

Page 105

[1] not sexual relations. It is not covered by this definition.
 [2] MR. KENDALL: The witness is not declining to tell
 [3] you anything he said to John Podesta.
 [4] BY MR. WISENBERG:
 [5] Q You denied the --
 [6] MR. WISENBERG: The witness is not declining to
 [7] tell me anything?
 [8] BY MR. WISENBERG:
 [9] Q Did you deny oral sex in any way, shape or form, to
 [10] John Podesta?
 [11] A I told you, sir, before, and I will say again, in
 [12] the aftermath of this story breaking, and what was told about
 [13] it, the next two days, next three days are just a blur to me.
 [14] I don't remember to whom I talked, when I talked to them, or
 [15] what I said.
 [16] Q So, you are not declining to answer, you just don't
 [17] remember?
 [18] A I honestly don't remember, no.
 [19] Q Okay.
 [20] A I'm not saying that anybody who had a contrary
 [21] memory is wrong. I do not remember.
 [22] Q Do you recall denying any sexual relationship with
 [23] Monica Lewinsky to the following people: Harry Thomasson,
 [24] Erskine Bowles, Harold Ickes, Mr. Podesta, Mr. Blumenthal,
 [25] Mr. Jordan, Ms. Betty Currie? Do you recall denying any

Page 106

[1] sexual relationship with Monica Lewinsky to those
 [2] individuals?
 [3] A I recall telling a number of those people that I
 [4] didn't have, either I didn't have an affair with Monica
 [5] Lewinsky or didn't have sex with her. And I believe, sir,
 [6] that -- you'll have to ask them what they thought. But I was
 [7] using those terms in the normal way people use them. You'll
 [8] have to ask them what they thought I was saying.
 [9] Q If they testified that you denied sexual relations
 [10] or relationship with Monica Lewinsky, or if they told us that
 [11] you denied that, do you have any reason to doubt them, in the
 [12] days after the story broke; do you have any reason to doubt
 [13] them?
 [14] A No. The -- let me say this. It's no secret to
 [15] anybody that I hoped that this relationship would never
 [16] become public. It's a matter of fact that it had been many,
 [17] many months since there had been anything improper about it,
 [18] in terms of improper contact. I --
 [19] Q Did you deny it to them or not, Mr. President?
 [20] A Let me finish. So, what -- I did not want to
 [21] mislead my friends, but I wanted to find language where I
 [22] could say that. I also, frankly, did not want to turn any of
 [23] them into witnesses, because I -- and, sure enough, they all
 [24] became witnesses.
 [25] Q Well, you knew they might be --

Page 107

[1] A And so --
 [2] Q -- witnesses, didn't you?
 [3] A And so I said to them things that were true about
 [4] this relationship. That I used -- in the language I used, I
 [5] said, there's nothing going on between us. That was true. I
 [6] said, I have not had sex with her as I defined it. That was
 [7] true. And did I hope that I would never have to be here on
 [8] this day giving this testimony? Of course.
 [9] But I also didn't want to do anything to complicate
 [10] this matter further. So, I said things that were true. They
 [11] may have been misleading, and if they were I have to take
 [12] responsibility for it, and I'm sorry.
 [13] Q It may have been misleading, sir, and you knew
 [14] though, after January 21st when the Post article broke and
 [15] said that Judge Starr was looking into this, you knew that
 [16] they might be witnesses. You knew that they might be called
 [17] into a grand jury, didn't you?
 [18] A That's right. I think I was quite careful what I
 [19] said after that. I may have said something to all these
 [20] people to that effect, but I'll also -- whenever anybody
 [21] asked me any details, I said, look, I don't want you to be a
 [22] witness or I turn you into a witness or give you information
 [23] that could get you in trouble. I just wouldn't talk. I, by
 [24] and large, didn't talk to people about this.
 [25] Q If all of these people -- let's leave out Mrs.

Page 108

[1] Currie for a minute. Vernon Jordan, Sid Blumenthal, John
 [2] Podesta, Harold Ickes, Erskine Bowles, Harry Thomasson, after
 [3] the story broke, after Judge Starr's involvement was known on
 [4] January 21st, have said that you denied a sexual relationship
 [5] with them. Are you denying that?
 [6] A No.
 [7] Q And you've told us that you --
 [8] A I'm just telling you what I meant by it. I told
 [9] you what I meant by it when they started this deposition.
 [10] Q You've told us now that you were being careful, but
 [11] that it might have been misleading. Is that correct?
 [12] A It might have been. Since we have seen this four-
 [13] year, \$40-million investigation come down to parsing the
 [14] definition of sex, I think it might have been. I don't think
 [15] at the time that I thought that's what this was going to be
 [16] about.
 [17] In fact, if you remember the headlines at the time,
 [18] even you mentioned the Post story. All the headlines were --
 [19] and all the talking, people who talked about this, including
 [20] a lot who have been quite sympathetic to your operation,
 [21] said, well, this is not really a story about sex, or this is
 [22] a story about subornation of perjury and these talking
 [23] points, and all this other stuff.
 [24] So, what I was trying to do was to give them
 [25] something they could -- that would be true, even if

Page 109

[1] misleading in the context of this deposition, and keep them
 [2] out of trouble, and let's deal -- and deal with what I
 [3] thought was the almost ludicrous suggestion that I had urged
 [4] someone to lie or tried to suborn perjury, in other words.
 [5] Q I want to go over some questions again. I don't
 [6] think you are going to answer them, sir. And so I don't need
 [7] a lengthy response, just a yes or a no. And I understand the
 [8] basis upon which you are not answering them, but I need to
 [9] ask them for the record.
 [10] If Monica Lewinsky says that while you were in the
 [11] Oval Office area you touched her breasts, would she be lying?
 [12] A Let me say something about all this.
 [13] Q All I really need for you, Mr. President --
 [14] A I know.
 [15] Q -- is to say --
 [16] A But you --
 [17] Q -- I won't answer under the previous grounds, or to
 [18] answer the question, you see, because we only have four
 [19] hours, and your answers --
 [20] A I know.
 [21] Q -- have been extremely lengthy.
 [22] A I know that. I'll give you four hours and 30
 [23] seconds, if you'll let me say something general about this.
 [24] I will answer to your satisfaction that I won't -- based on
 [25] my statement, I will not answer. I would like 30 seconds at

Page 110

[1] the end to make a statement, and you can have 30 seconds more
 [2] on your time, if you'll let me say this to the grand jury and
 [3] to you. And I don't think it's disrespectful at all. I've
 [4] had a lot of time to think about this.
 [5] But, go ahead and ask your questions.
 [6] Q The question is, if Monica Lewinsky says that while
 [7] you were in the Oval Office area you touched her breasts,
 [8] would she be lying?
 [9] A That is not my recollection. My recollection is
 [10] that I did not have sexual relations with Ms. Lewinsky and
 [11] I'm staying on my former statement about that.
 [12] Q If she said --
 [13] A My, my statement is that I did not have sexual
 [14] relations as defined by that.
 [15] Q If she says that you kissed her breasts, would she
 [16] be lying?
 [17] A I'm going to revert to my former statement.
 [18] Q Okay. If Monica Lewinsky says that while you were
 [19] in the Oval Office area you touched her genitalia, would she
 [20] be lying? And that calls for a yes, no, or reverting to your
 [21] former statement.
 [22] A I will revert to my statement on that.
 [23] Q If Monica Lewinsky says that you used a cigar as a
 [24] sexual aid with her in the Oval Office area, would she be
 [25] lying? Yes, no, or won't answer?

Page 111

[1] A I will revert to my former statement.
 [2] Q If Monica Lewinsky says that you had phone sex with
 [3] her, would she be lying?
 [4] A Well, that is, at least in general terms, I think,
 [5] is covered by my statement. I addressed that in my
 [6] statement, and that, I don't believe, is --
 [7] Q Let me define phone sex for purposes of my
 [8] question. Phone sex occurs when a party to a phone
 [9] conversation masturbates while the other party is talking in
 [10] a sexually explicit manner. And the question is, if Monica
 [11] Lewinsky says that you had phone sex with her, would she be
 [12] lying?
 [13] A I think that is covered by my statement.
 [14] Q Did you, on or about January 13th, 1998, Mr.
 [15] President, ask Erskine Bowles to ask John Hilley if he would
 [16] give a recommendation for Monica Lewinsky?
 [17] A In 1998?
 [18] Q Yes. On or about January 13th, 1998, did you ask
 [19] Erskine Bowles, your Chief of Staff, if he would ask John
 [20] Hilley to give a recommendation for Monica Lewinsky?
 [21] A At some point, sir, I believe I talked to Erskine
 [22] Bowles about whether Monica Lewinsky could get a
 [23] recommendation that was not negative from the Legislative
 [24] Affairs Office. I believe I did.
 [25] Q I just didn't hear the very last part.

Page 112

[1] A I think the answer is, I think, yes. At some point
 [2] I talked to Erskine Bowles about this.
 [3] Q Okay.
 [4] A I do not know what the date was. At some point I
 [5] did talk to him.
 [6] Q And if Erskine Bowles has told us that he told John
 [7] Podesta to carry out your wishes, and John Podesta states
 [8] that it was three or four days before your deposition, which
 [9] would be the 13th or the 14th, are you in a position to deny
 [10] that?
 [11] A The 13th or 14th of?
 [12] Q January, as to date.
 [13] A I don't know. I don't know when the date was.
 [14] Q Okay.
 [15] A I'm not in a position to deny it. I won't deny it.
 [16] I'm sure that they are both truthful men. I don't know when
 [17] the date was.
 [18] Q Do you recall asking Erskine Bowles to do that?
 [19] A I recall talking to Erskine Bowles about that, and
 [20] my recollection is, sir, that Ms. Lewinsky was moving to New
 [21] York, wanted to get a job in the private sector, was
 [22] confident she would get a good recommendation from the
 [23] Defense Department, and was concerned that because she had
 [24] been moved from the Legislative Affairs Office, transferred
 [25] to the Defense Department, that her ability to get a job

Page 113

[1] might be undermined by a bad recommendation from the
 [2] Legislative Affairs Office.
 [3] So, I asked Erskine if we could get her a
 [4] recommendation that just was at least neutral, so that if she
 [5] had a good recommendation from the Defense Department it
 [6] wouldn't prevent her from getting a job in the private
 [7] sector.
 [8] Q If Mr. Bowles has told us that, in fact, you told
 [9] him that she already had a job and had already listed Mr.
 [10] Hilley as a reference and wanted him to be available as a
 [11] recommendation, would you be in -- is that inconsistent with
 [12] your memory?
 [13] A A little bit, but I think -- my memory is that when
 [14] you're, when you get a job like that you have to give them a
 [15] resume, which says where you've worked and who your
 [16] supervisor was. And I think that that's my recollection. My
 [17] recollection is that -- slightly different from that.
 [18] Q And who was it that asked you to do that on Monica
 [19] Lewinsky's behalf?
 [20] A I think she did. You know, she tried for months
 [21] and months to get a job back in the White House, not so much
 [22] in the West Wing but somewhere in the White House complex,
 [23] including the Old Executive Office Building. And she talked
 [24] to Marsha Scott, among others. She very much wanted to come
 [25] back. And she interviewed for some jobs but never got one.

Page 114

[1] She was, from time to time, upset about it.
 [2] And I think what she was afraid of is that she
 [3] couldn't get a -- from the minute she left the White House
 [4] she was worried about this. That if she didn't come back to
 [5] the White House and work for awhile and get a good job
 [6] recommendation, that no matter how well she had done at the
 [7] Pentagon it might hurt her future employment prospects.
 [8] Well, it became obvious that, you know, her mother
 [9] had moved to New York. She wanted to go to New York. She
 [10] wasn't going to get a job back in the White House. So, she wanted
 [11] to get a job in the private sector, and said, I hope that I
 [12] won't get a letter out of the Legislative Affairs Office that
 [13] will prevent my getting a job in the private sector. And
 [14] that's what I talked to Erskine about.
 [15] Now, that's my entire memory of this.
 [16] Q All right. I want to go back briefly to the
 [17] December 28th conversation with Ms. Lewinsky. I believe you
 [18] testified to the effect that she asked you, what if they ask
 [19] me about gifts you gave me. My question to you is, after
 [20] that statement by her, did you ever have a conversation with
 [21] Betty Currie about gifts, or picking something up from Monica
 [22] Lewinsky?
 [23] A I don't believe I did, sir. No.
 [24] Q You never told her anything to this effect, that
 [25] Monica has something to give you?

Page 115

[1] A No, sir.
 [2] Q That is to say, Betty Currie?
 [3] A No, sir, I didn't. I don't have any memory of that
 [4] whatever.
 [5] Q And so you have no knowledge that, or you had no
 [6] knowledge at the time, that Betty Currie went and picked up,
 [7] your secretary went and picked up from Monica Lewinsky items
 [8] that were called for by the Jones subpoena and hid them under
 [9] her bed? You had no knowledge that anything remotely like
 [10] that was going to happen?
 [11] A I did not. I did not know she had those items, I
 [12] believe, until that was made public.
 [13] Q And you agree with me that that would be a very
 [14] wrong thing to do, to hide evidence in a civil case, or any
 [15] case? Isn't that true?
 [16] A Yes. I don't know that, that Ms. Currie knew that
 [17] that's what she had at all. But --
 [18] Q I'm not saying she did. I'm just saying --
 [19] A I had -- it is, if Monica Lewinsky did that after
 [20] they had been subpoenaed and she knew what she was doing, she
 [21] should not have done that.
 [22] Q And if you knew, you --
 [23] A And I --
 [24] Q -- shouldn't have done it?
 [25] A Indeed, I, myself, told her, if they ask you for

Page 116

[1] gifts you have to give them what you have. And I don't
 [2] understand if, in fact, she was worried about this, why she
 [3] was so worried about it. It was no big deal.
 [4] Q I want to talk about a December 17th phone
 [5] conversation you had with Monica Lewinsky at approximately
 [6] 2:00 a.m. Do you recall making that conversation and telling
 [7] her initially about the death of Betty's brother, but then
 [8] telling her that she was on the witness list, and that it
 [9] broke your heart that she was on the witness list?
 [10] A No, sir, I don't, but it would -- it, it would --
 [11] it is quite possible that that happened, because, if you
 [12] remember, earlier in this meeting you asked me some questions
 [13] about what I'd said to Monica about testimony and affidavits,
 [14] and I was struggling to try to remember whether this happened
 [15] in a meeting or a phone call.
 [16] Now, I remember I called her to tell her Betty's
 [17] brother had died. I remember that. And I know it was in the
 [18] middle of December, and I believe it was before Monica had
 [19] been subpoenaed. So, I think it is quite possible that I
 [20] called her at that time and had not talked to her since the
 [21] 6th -- and you asked me this earlier -- I believe when I saw
 [22] her on the 6th, I don't think I knew she was on the witness
 [23] list then, then it's quite possible I would say something
 [24] like that. I don't have any memory of it, but I certainly
 [25] wouldn't dispute that I might have said that.

Page 117

[1] Q And in that conversation, or in any conversation in
 [2] which you informed her she was on the witness list, did you
 [3] tell her, you know, you can always say that you were coming
 [4] to see Betty or bringing me letters? Did you tell her
 [5] anything like that?
 [6] A I don't remember. She was coming to see Betty. I
 [7] can tell you this. I absolutely never asked her to lie.
 [8] Q Sir, every time she came to see Betty and you were
 [9] in the Oval Office, she was coming to see you, too, wasn't
 [10] she, or just about every time?
 [11] A I think just about every time. I don't think every
 [12] time. I think there was a time or two where she came to see
 [13] Betty when she didn't see me.
 [14] Q So, do you remember telling her any time, any time
 [15] when you told her, or after you told her that she was on the
 [16] witness list, something to this effect: You know, you can
 [17] always say you were coming to see Betty, or you were bringing
 [18] me letters?
 [19] A I don't remember exactly what I told her that
 [20] night.
 [21] Q Did you --
 [22] A I don't remember that. I remember talking about
 [23] the nature of our relationship, how she got in. But I also
 [24] will tell you that I felt quite comfortable that she could
 [25] have executed a truthful affidavit, which would not have

Page 118

[1] disclosed the embarrassing details of the relationship that
 [2] we had had, which had been over for many, many months by the
 [3] time this incident occurred.
 [4] Q Did you tell her anytime in December something to
 [5] that effect: You know, you can always say that you were
 [6] coming to see Betty or you were bringing me letters? Did you
 [7] say that, or anything like that, in December '97 or January
 [8] '98, to Monica Lewinsky?
 [9] A Well, that's a very broad question. I do not
 [10] recall saying anything like that in connection with her
 [11] testimony. I could tell you what I do remember saying, if
 [12] you want to know. But I don't -- we might have talked about
 [13] what to do in a non legal context at some point in the past,
 [14] but I have no specific memory of that conversation.
 [15] I do remember what I said to her about the possible
 [16] testimony.
 [17] Q You would agree with me, if you did say something
 [18] like that to her, to urge her to say that to the Jones
 [19] people, that that would be part of an effort to mislead the
 [20] Jones people, no matter how evil they are and corrupt?
 [21] A I didn't say they were evil. I said what they were
 [22] doing here was wrong, and it was.
 [23] Q Wouldn't that be misleading?
 [24] A Well, again, you are trying to get me to
 [25] characterize something that I'm -- that I don't know if I

Page 119

[1] said or not, without knowing whether the whole, whether the
 [2] context is complete or not. So, I would have to know, what
 [3] was the context, what were all the surrounding facts.
 [4] I can tell you this: I never asked Ms. Lewinsky to
 [5] lie. The first time that she raised with me the possibility
 [6] that she might be a witness or I told her -- you suggested
 [7] the possibility in this December 17th timeframe -- I told her
 [8] she had to get a lawyer. And I never asked her to lie.
 [9] Q Did you ever say anything like that, you can always
 [10] say that you were coming to see Betty or bringing me letters?
 [11] Was that part of any kind of a, anything you said to her or a
 [12] cover story, before you had any idea she was going to be part
 [13] of Paula Jones?
 [14] A I might well have said that.
 [15] Q Okay.
 [16] A Because I certainly didn't want this to come out,
 [17] if I could help it. And I was concerned about that. I was
 [18] embarrassed about it. I knew it was wrong. And, you know,
 [19] of course, I didn't want it to come out. But --
 [20] Q But you are saying that you didn't say anything --
 [21] I want to make sure I understand. Did you say anything like
 [22] that once you knew or thought she might be a witness in the
 [23] Jones case? Did you repeat that statement, or something like
 [24] it to her?
 [25] A Well, again, I don't recall, and I don't recall

Page 120

[1] whether I might have done something like that, for example,
 [2] if somebody says, what if the reporters ask me this, that or
 [3] the other thing. I can tell you this: In the context of
 [4] whether she could be a witness, I have a recollection that
 [5] she asked me, well, what do I do if I get called as a
 [6] witness, and I said, you have to get a lawyer. And that's
 [7] all I said. And I never asked her to lie.
 [8] Q Did you tell her to tell the truth?
 [9] A Well, I think the implication was she would tell
 [10] the truth. I've already told you that I felt strongly that
 [11] she could issue, that she could execute an affidavit that
 [12] would be factually truthful, that might get her out of having
 [13] to testify. Now, it obviously wouldn't if the Jones people
 [14] knew this, because they knew that if they could get this and
 [15] leak it, it would serve their larger purposes, even if the
 [16] judge ruled that she couldn't be a witness in the case. The
 [17] judge later ruled she wouldn't be a witness in the case. The
 [18] judge later ruled the case had no merit.
 [19] So, I knew that. And did I hope she'd be able to
 [20] get out of testifying on an affidavit? Absolutely. Did I
 [21] want her to execute a false affidavit? No, I did not.
 [22] Q If Monica Lewinsky has stated that her affidavit
 [23] that she didn't have a sexual relationship with you is, in
 [24] fact, a lie, I take it you disagree with that?
 [25] A No. I told you before what I thought the issue was

Page 121

[1] there. I think the issue is how do you define sexual
 [2] relationship. And there was no definition imposed on her at
 [3] the time she executed the affidavit. Therefore, she was free
 [4] to give it any reasonable meaning.
 [5] Q And if she says she was lying --
 [6] A And I believe --
 [7] Q -- under your common sense ordinary meaning that
 [8] you talked about earlier, Mr. President, that most Americans
 [9] would have, if she says sexual relationship, saying I didn't
 [10] have one was a lie because I had oral sex with the President,
 [11] I take it, you would disagree with that?
 [12] A Now, we're back to where we started and I have to
 [13] invoke my statement. But, let me just say one thing. I've
 [14] read a lot, and obviously I don't know whether any of it's
 [15] accurate, about what she said, and what purports to be on
 [16] those tapes.
 [17] And this thing -- and I searched my own memory.
 [18] This reminds me, to some extent, of the hearings when
 [19] Clarence Thomas and Anita Hill were both testifying under
 [20] oath. Now, in some rational way, they could not have both
 [21] been telling the truth, since they had directly different
 [22] accounts of a shared set of facts. Fortunately, or maybe you
 [23] think unfortunately, there was no special prosecutor to try
 [24] to go after one or the other of them, to take sides and try
 [25] to prove one was a liar. And so, Judge Thomas was able to go

Page 122

[1] on and serve on the Supreme Court.
 [2] What I learned from that, I can tell you that I was
 [3] a citizen out there just listening. And when I heard both of
 [4] them testify, what I believed after it was over, I believed
 [5] that they both thought they were telling the truth.
 [6] This is -- you're dealing with, in some ways, the
 [7] most mysterious area of human life. I'm doing the best I can
 [8] to give you honest answers.
 [9] Q Mr. President --
 [10] A And that's all I can say.
 [11] Q I'm sorry.
 [12] A And, you know, those people both testified under
 [13] oath. So, if there'd been a special prosecutor, they could,
 [14] one of them could have gone after Anita Hill, another could
 [15] have gone after Clarence Thomas. I thank God there was no
 [16] such thing then, because I don't believe that it was a proper
 [17] thing.
 [18] Q One of --
 [19] A And I think they both thought they were telling the
 [20] truth. So, maybe Ms. Lewinsky believes she's telling the
 [21] truth, and I'm glad she got her mother and herself out of
 [22] trouble. I'm glad you gave her that sweeping immunity. I'm
 [23] glad for the whole thing. I, I, I -- it breaks my heart that
 [24] she was ever involved in this.
 [25] Q I want to go back to a question about Vernon

Page 123

[1] Jordan. I want to go back to late December and early
 [2] January, late December of '97 and early January of '98.
 [3] During this time, Mr. President, you are being sued for
 [4] sexual harassment by a woman who claims, among other things,
 [5] that others got benefits that she didn't because she didn't
 [6] have oral sex with you. While this is happening, your
 [7] powerful friend, Vernon Jordan, is helping to get Monica
 [8] Lewinsky a job and a lawyer. He's helping to get a job and a
 [9] lawyer for someone who had some kind of sex with you, and who
 [10] has been subpoenaed in the very case, the Jones case.
 [11] Don't you see a problem with this? Didn't you see
 [12] a problem with this?
 [13] A No. Would you like to know why?
 [14] Q Isn't that why -- I would. But isn't that why
 [15] Vernon Jordan asked you on December 19th whether or not you
 [16] had sexual relationships with Monica Lewinsky and why he
 [17] asked her, because he knew it would be so highly improper to
 [18] be helping her with a lawyer and a job if, in fact, she had
 [19] had a relationship with you?
 [20] A I don't know. I don't believe that at all. I
 [21] don't believe that at all, particularly since, even if you
 [22] look at the facts here in their light most unfavorable to me,
 [23] no one has suggested that there was any sexual harassment on
 [24] my part. And I don't think it was wrong to be helping her.
 [25] Look --

Page 124

[1] Q A subpoenaed witness in a case against you?
 [2] A Absolutely. Look, for one thing, I had already
 [3] proved in two ways that I was not trying to influence her
 [4] testimony. I didn't order her to be hired at the White
 [5] House. I could have done so. I wouldn't do it. She tried
 [6] for months to get in. She was angry.
 [7] Secondly, after I --
 [8] Q Wasn't she kept --
 [9] A After I terminated the improper contact with her,
 [10] she wanted to come in more than she did. She got angry when
 [11] she didn't get in sometimes. I knew that that might make her
 [12] more likely to speak, and I still did it because I had to
 [13] limit the contact.
 [14] And, thirdly, let me say, I formed an opinion
 [15] really early in 1996, and again -- well, let me finish the
 [16] sentence. I formed an opinion early in 1996, once I got into
 [17] this unfortunate and wrong conduct, that when I stopped it,
 [18] which I knew I'd have to do and which I should have done a
 [19] long time before I did, that she would talk about it. Not
 [20] because Monica Lewinsky is a bad person. She's basically a
 [21] good girl. She's a good young woman with a good heart and a
 [22] good mind. I think she is burdened by some unfortunate
 [23] conditions of her, her upbringing. But she's basically a
 [24] good person.
 [25] But I knew that the minute there was no longer any

Page 125

[1] contact, she would talk about this. She would have to. She
 [2] couldn't help it. It was, it was a part of her psyche. So,
 [3] I had put myself at risk, sir. I was not trying to buy her
 [4] silence or get Vernon Jordan to buy her silence. I thought
 [5] she was a good person. She had not been involved with me for
 [6] a long time in any improper way, several months, and I wanted
 [7] to help her get on with her life. It's just as simple as
 [8] that.
 [9] MR. WISENBERG: It's time for a break.
 [10] MR. KENDALL: Okay. 4:49.
 [11] (Whereupon, the proceedings were recessed from 4:49 p.
 [12] until 5:05 p.m.)
 [13] MR. KENDALL: Bob, we are at 2 hours and 55
 [14] minutes.
 [15] MR. BITTMAN: Two hours and 55 minutes, thank you.
 [16] BY MR. BITTMAN:
 [17] Q Mr. President.
 [18] A Mr. Bittman.
 [19] Q Apparently we have one hour and five minutes left,
 [20] if we stick to the four-hour timeframe.
 [21] MR. KENDALL: Plus 30 seconds.
 [22] MR. BITTMAN: And 30 seconds, that's right.
 [23] THE WITNESS: You gave me my 30 seconds' soliloquy
 [24] So, I owe you 30 seconds.
 [25]

Page 126

[1] BY MR. BITTMAN:
 [2] Q You are very generous. That actually segues very
 [3] nicely into one of the grand jurors asked, pointed out
 [4] actually, that you indicated at the beginning of the
 [5] deposition that you would, you would answer all the grand
 [6] jurors, you wanted to answer all the grand jurors' questions.
 [7] And they wanted to know whether you would be willing to stay
 [8] beyond the four-hour period to, in fact, answer all their
 [9] questions.
 [10] A Well, let's see how we do in the next hour, and
 [11] then we'll decide.
 [12] Q Okay. Let me draw your attention to early January
 [13] of this year, after Christmas, before your deposition. Do
 [14] you remember talking to Betty Currie about Monica, who had
 [15] just called her and said that she, Monica, needed to talk to
 [16] you before she signed something?
 [17] A I'm not sure that I do remember that. But, go
 [18] ahead.
 [19] Q This is in early January. And then Betty Currie
 [20] relayed this to you that Monica called, it's important, she
 [21] needs to talk to you before she signs something. And then
 [22] you do, indeed, talk to Monica that day on the telephone.
 [23] A I did talk to her that day?
 [24] Q Yes.
 [25] MR. KENDALL: Mr. President, excuse me. That's a

Page 127

[1] question. If you have a memory of that, you can answer.
 [2] THE WITNESS: I'm trying to remember when the last
 [3] time I talked to her was. I am aware, sir, that she signed
 [4] this affidavit about this time, sometime in the first week in
 [5] January. I may have talked to her before she did it. I
 [6] don't know. I talked to her a number of times between the
 [7] time Betty's brother died and Christmas. Then I saw her on
 [8] December 28. I may have talked to her, but I don't remember
 [9] the specific conversation.
 [10] BY MR. BITTMAN:
 [11] Q And you would have talked about the -- she had just
 [12] given you a gift actually in early January, a book on the
 [13] Presidents of the United States. And you discussed this with
 [14] her and she said that you said you liked it a lot.
 [15] A I did like it a lot. I told you that. My
 [16] impression, my belief was that she gave me that book for
 [17] Christmas. Maybe that's not right. I think she had that
 [18] book delivered to me for Christmas. And then, as I remember,
 [19] I went to Bosnia and for some reason she wasn't there around
 [20] Christmas time.
 [21] But, anyway, maybe I didn't get it until January.
 [22] My recollection was that I had gotten it right before
 [23] Christmas.
 [24] Q Let me see if I can jog your memory further.
 [25] Monica talked to you in that phone conversation that told you

Page 128

(1) that she had just met with her attorney that Mr. Jordan
 (2) arranged with her, and the attorney said that if she is
 (3) deposed that they were going to ask her how she got her job
 (4) at the Pentagon. And Monica then asked you, what do you
 (5) think I should say, how do I answer that question, how did I
 (6) get the job at the Pentagon. Did you talk to Monica about
 (7) that, about possibilities?
 (8) A I don't believe -- no. I don't remember her asking
 (9) me that. But if she, if she had asked me that, I would have
 (10) told her to tell the truth. I -- and I didn't, you know, I
 (11) don't know exactly how she got her job at the Pentagon. I
 (12) know Evelyn Lieberman wanted to transfer her out of the job
 (13) she had, and somebody must have arranged that. But I didn't
 (14) arrange it.
 (15) Q Now, that's actually not my question. My question
 (16) is whether you remember talking to Monica about her being
 (17) concerned that, I may have to answer some questions about how
 (18) and why I was transferred to the Pentagon out of the White
 (19) House, fearing that this would --
 (20) A No, I don't remember that at all.
 (21) Q -- lead to questions, or answers that would reveal
 (22) your relationship?
 (23) A Oh, no, sir. I don't remember that. Maybe
 (24) somebody -- maybe she did. But I only remember -- well, I
 (25) don't remember that. That's all I can tell you. I don't

Page 129

(1) remember that.
 (2) Q Are you saying, Mr. President, that you did not
 (3) then say to Ms. Lewinsky that you could always say that
 (4) people in Legislative Affairs got you the job, or helped you
 (5) get it?
 (6) A I have no recollection of that whatever.
 (7) Q Are you saying you didn't say it?
 (8) A No, sir. I'm telling you, I want to say I don't
 (9) recall -- I don't have any memory of this as I sit here
 (10) today. And I can tell you this, I never asked her to lie. I
 (11) never did. And I don't have any recollection of the specific
 (12) thing you are saying to me.
 (13) Now, if I could back up, there were several times
 (14) when Monica Lewinsky talked to me on the telephone in 1996,
 (15) in person in 1997, about her being concerned about what
 (16) anybody would say about her transfer from the White House to
 (17) the Pentagon. But I remember no conversation in which she
 (18) was concerned about it for the reasons you just mentioned.
 (19) And all my memory is, she was worried about it
 (20) because she thought it would keep her from getting a good job
 (21) down the road, and she talked to me about it constantly in
 (22) 1997. She thought, well, I'll never have my record clear
 (23) unless I work somewhere in the White House complex where I
 (24) can get a good recommendation. But in the context that you
 (25) mention it, I do not recall a conversation.

Page 130

(1) Q Did you ever tell Ms. Lewinsky, or promise to her
 (2) that you would do your best to get her back into the White
 (3) House after the 1996 Presidential elections?
 (4) A What I told Ms. Lewinsky was that I would, I would
 (5) do what I could to see, if she had a good record at the
 (6) Pentagon, and she assured me she was doing a good job and
 (7) working hard, that I would do my best to see that the fact
 (8) that she had been sent away from the Legislative Affairs
 (9) section did not keep her from getting a job in the White
 (10) House, and that is, in fact, what I tried to do. I had a
 (11) conversation with Ms. Scott about it, and I tried to do that.
 (12) But I did not tell her I would order someone to
 (13) hire her, and I never did, and I wouldn't do that. It
 (14) wouldn't be right.
 (15) Q When you received the book, this gift from Monica,
 (16) the Presidents of the United States, this book that you liked
 (17) and you talked with Monica about, did it come with a note?
 (18) Do you remember the note that it came with, Mr. President?
 (19) A No, sir, I don't.
 (20) Q Do you remember that in the note she wrote that,
 (21) she expressed how much she missed you and how much she cared
 (22) for you, and you and she later talked about this in this
 (23) telephone conversation, and you said -- and she apologized
 (24) for putting such emotional, romantic things in this note, and
 (25) you said, yeah, you shouldn't have written some of those

Page 131

(1) things, you shouldn't put those things down on paper? Did
 (2) you ever say anything like that to Ms. Lewinsky?
 (3) A Oh, I believe I did say something like that to Ms.
 (4) Lewinsky. I don't remember doing something as late as you
 (5) suggest. I'm not saying I didn't. I have no recollection of
 (6) that.
 (7) Keep in mind now, it had been quite a long time
 (8) since I had had any improper contact with her. And she was,
 (9) in a funny way, almost more attached to me than she had been
 (10) before. In '96, she had a long relationship, she said, with
 (11) a man whom she liked a lot. And I didn't know what else was
 (12) going on in her private life in '97. But she talked to me
 (13) occasionally about people she was going out with.
 (14) But normally her language at this point was, if
 (15) affectionate, was, was not improperly affectionate, I would
 (16) say. So -- but, it could have happened. I wouldn't say it
 (17) didn't. I just don't remember it at this late date.
 (18) Q Let me refer back to one of the subjects we talked
 (19) about at one of the earlier breaks, right before one of the
 (20) earlier breaks, and that is your meeting with Mrs. Currie on
 (21) January 18th. This is the Sunday after your deposition in
 (22) the Paula Jones case.
 (23) You said that you spoke to her in an attempt to
 (24) refresh your own recollection about the events involving
 (25) Monica Lewinsky, is that right?

Page 132

(1) A Yes.
 (2) Q How did you making the statement, I was never alone
 (3) with her, right, refresh your recollection?
 (4) A Well, first of all, let's remember the context
 (5) here. I did not at that time know of your involvement in
 (6) this case. I just knew that obviously someone had given them
 (7) a lot of information, some of which struck me as accurate,
 (8) some of which struck me as dead wrong. But it led them to
 (9) write, ask me a whole series of questions about Monica
 (10) Lewinsky.
 (11) Then on Sunday morning, this Drudge report came
 (12) out, which used Betty's name, and I thought that we were
 (13) going to be deluged by press comments. And I was trying to
 (14) refresh my memory about what the facts were.
 (15) So, when I said, we were never alone, right, I
 (16) think I also asked her a number of other questions, because
 (17) there were several times, as I'm sure she would acknowledge,
 (18) when I either asked her to be around. I remember once in
 (19) particular when I was talking with Ms. Lewinsky when I asked
 (20) Betty to be in the, actually, in the next room in the dining
 (21) room, and, as I testified earlier, once in her own office.
 (22) But I meant that she was always in the Oval Office
 (23) complex, in that complex, while Monica was there. And I
 (24) believe that this was part of a series of questions I asked
 (25) her to try to quickly refresh my memory. So, I wasn't trying

Page 133

(1) to get her to say something that wasn't so. And, in fact, I
 (2) think she would recall that I told her to just relax, go in
 (3) the grand jury and tell the truth when she had been called as
 (4) a witness.
 (5) Q So, when you said to Mrs. Currie that, I was never
 (6) alone with her, right, you just meant that you and Ms.
 (7) Lewinsky would be somewhere perhaps in the Oval Office or
 (8) many times in your back study, is that correct?
 (9) A That's right. We were in the back study.
 (10) Q And then --
 (11) A Keep in mind, sir, I just want to make it -- I was
 (12) talking about 1997. I was never, ever trying to get Betty
 (13) Currie to claim that on the occasions when Monica Lewinsky
 (14) was there when she wasn't anywhere around, that she was. I
 (15) would never have done that to her, and I don't think she
 (16) thought about that. I don't think she thought I was
 (17) referring to that.
 (18) Q Did you put a date restriction? Did you make it
 (19) clear to Mrs. Currie that you were only asking her whether
 (20) you were never alone with her after 1997?
 (21) A Well, I don't recall whether I did or not, but I
 (22) assumed -- if I didn't, I assumed she knew what I was talking
 (23) about, because it was the point at which Ms. Lewinsky was out
 (24) of the White House and had to have someone WAVE her in, in
 (25) order to get in the White House. And I do not believe to

Page 134

- [1] this day that I was -- in 1997, that she was ever there and
 [2] that I ever saw her unless Betty Currie was there. I don't
 [3] believe she was.
 [4] Q Do you agree with me that the statement, "I was
 [5] never alone with her", is incorrect? You were alone with
 [6] Monica Lewinsky, weren't you?
 [7] A Well, again, it depends on how you define alone.
 [8] Yes, we were alone from time to time, even during 1997, even
 [9] when there was absolutely no improper contact occurring.
 [10] Yes, that is accurate.
 [11] But there were also a lot of times when, even
 [12] though no one could see us, the doors were open to the halls,
 [13] on both ends of the halls, people could hear. The Navy
 [14] stewards could come in and out at will, if they were around.
 [15] Other things could be happening. So, there were a lot of
 [16] times when we were alone, but I never really thought we were.
 [17] And sometimes when we, when -- but, as far as I
 [18] know, what I was trying to determine, if I might, is that
 [19] Betty was always around, and I believe she was always around
 [20] where I could basically call her or get her if I needed her.
 [21] Q When you said to Mrs. Currie, you could see and
 [22] hear everything, that wasn't true either, was it, as far as
 [23] you knew? You've already --
 [24] A My memory of that --
 [25] Q -- testified that Betty was not there.

Page 135

- [1] A My memory of that was that, that she had the
 [2] ability to hear what was going on if she came in the Oval
 [3] Office from her office. And a lot of times, you know, when I
 [4] was in the Oval Office, she just had the door open to her
 [5] office. Then there was -- the door was never completely
 [6] closed to the hall. So, I think there was -- I'm not
 [7] entirely sure what I meant by that, but I could have meant
 [8] that she generally would be able to hear conversations, even
 [9] if she couldn't see them. And I think that's what I meant.
 [10] Now, I could have been referring not generally to
 [11] every time she was there, but one, one particular time I
 [12] remember when Ms. Lewinsky was there when I asked Betty --
 [13] and I'm sorry to say for reasons I don't entirely remember --
 [14] to actually stay in the dining room while I talked with
 [15] Monica. I do remember one such instance.
 [16] Q Well, you've already testified that this -- you did
 [17] almost everything you could to keep this relationship secret.
 [18] So, would it be fair to say -- even from Mrs. Currie. She
 [19] didn't know about the nature, that is, your intimate,
 [20] physically intimate relationship with Ms. Lewinsky, did she?
 [21] A As far as I know, she is unaware of what happened
 [22] on the, on the occasions when I saw her in 1996 when
 [23] something improper happened. And she was unaware of the one
 [24] time that I recall in 1997 when something happened.
 [25] I think she was quite well aware that I was

Page 136

- [1] determined to impose the appropriate limits on the
 [2] relationship when I was trying to do it. And the -- you
 [3] know, anybody would hope that this wouldn't become public.
 [4] Although I frankly, from 1996 on, always felt that if I
 [5] severed inappropriate contact with Ms. Lewinsky, sooner or
 [6] later it would get public. And I never thought it would be
 [7] part of the Jones case. I never even thought about that. I
 [8] never thought -- I certainly never thought it would be part
 [9] of your responsibilities.
 [10] Q My question was --
 [11] A But I did believe that she would talk about it.
 [12] Q My question was more simple than that. Mrs. Currie
 [13] did not know of the physically intimate nature of your
 [14] relationship, did she?
 [15] A I don't believe she did, no.
 [16] Q Okay. So, you would have done -- you tried to keep
 [17] that nature of the relationship from Mrs. Currie?
 [18] A Absolutely. I --
 [19] Q So, you would not have engaged in those physically
 [20] intimate acts if you knew that Mrs. Currie could see or hear
 [21] that, is that correct?
 [22] A That's correct. But, keep in mind, sir, I was
 [23] talking about 1997. That occurred, to the -- and I believe
 [24] that occurred only once in February of 1997. I stopped it.
 [25] I never should have started it, and I certainly shouldn't

Page 137

- [1] have started it back after I resolved not to in 1996. And I
 [2] was referring to 1997.
 [3] And I -- what -- as I say, I do not know -- her
 [4] memory and mine may be somewhat different. I do not know
 [5] whether I was asking her about a particular time when Monica
 [6] was upset and I asked her to stand, stay back in the dining
 [7] area. Or whether I was, had reference to the fact that if
 [8] she kept the door open to the Oval Office, because it was
 [9] always -- the door to the hallway was always somewhat open,
 [10] that she would always be able to hear something if anything
 [11] went on that was, you know, too loud, or whatever.
 [12] I do not know what I meant. I'm just trying to
 [13] reconcile the two statements as best I can, without being
 [14] sure.
 [15] Q There was at least one event where Mrs. Currie was
 [16] definitely not even in the Oval Office area, isn't that
 [17] right? And I think you began to testify about that before.
 [18] That was at the radio address.
 [19] A I'm not sure of that. But in that case, there was,
 [20] there was certainly someone else there. I don't know --
 [21] Q Well, why would you be testing Mrs. Currie's memory
 [22] about whether someone else was there?
 [23] A Well, I can say this. If I'm in the Oval Office --
 [24] my belief is that there was someone else there, somewhere in
 [25] the Oval Office complex. I've looked at our -- I've looked

Page 138

- [1] at the film. This, this night has become legendary now, you
 [2] know. I've looked at the, I've looked at the film we have.
 [3] I've looked at my schedules. I've seen the people that were
 [4] at the radio address.
 [5] I do believe that I was alone with her from 15 to
 [6] 20 minutes. I do believe that things happened then which
 [7] were inappropriate. I don't remember whether Betty was there
 [8] or not, but I can't imagine that, since all this happened
 [9] more or less continuously in that time period, there must
 [10] have been someone who was working around the radio address
 [11] who stayed around somewhere. That would be my guess. I
 [12] don't know. I'm sorry. I don't have records about who it
 [13] would be. But I doubt very seriously if we were all alone in
 [14] that Oval Office complex then.
 [15] Q Mr. President, if there is a semen stain belonging
 [16] to you on a dress of Ms. Lewinsky's, how would you explain
 [17] that?
 [18] A Well, Mr. Bittman, I, I don't -- first of all, when
 [19] you asked me for a blood test, I gave you one promptly. You
 [20] came over here and got it. That's -- we met that night and
 [21] talked. So, that's a question you already know the answer
 [22] to. Not if, but you know whether.
 [23] And the main thing I can tell you is that doesn't
 [24] affect the opening statement I made. The opening statement I
 [25] made is that I had inappropriate intimate contact. I take

Page 139

- [1] full responsibility for it. It wasn't her fault, it was
 [2] mine. I do not believe that I violated the definition of
 [3] sexual relations I was given by directly touching those parts
 [4] of her body with the intent to arouse or gratify. And that's
 [5] all I have to say.
 [6] I think, for the rest, you know, you know what the
 [7] evidence is and it doesn't affect that statement.
 [8] Q Is it possible or impossible that your semen is on
 [9] a dress belonging to Ms. Lewinsky?
 [10] A I have nothing to add to my statement about it.
 [11] sir. You, you know whether -- you know what the facts are.
 [12] There's no point in a hypothetical.
 [13] Q Don't you know what the facts are also, Mr.
 [14] President?
 [15] A I have nothing to add to my statement, sir.
 [16] Q Getting back to the conversation you had with Mrs.
 [17] Currie on January 18th, you told her -- if she testified that
 [18] you told her, Monica came on to me and I never touched her,
 [19] you did, in fact, of course, touch Ms. Lewinsky, isn't that
 [20] right, in a physically intimate way?
 [21] A Now, I've testified about that. And that's one of
 [22] those questions that I believe is answered by the statement
 [23] that I made.
 [24] Q What was your purpose in making these statements t
 [25] Mrs. Currie, if they weren't for the purpose to try to

Page 140

[1] suggest to her what she should say if ever asked?
 [2] A Now, Mr. Bittman, I told you, the only thing I
 [3] remember is when all this stuff blew up, I was trying to
 [4] figure out what the facts were. I was trying to remember. I
 [5] was trying to remember every time I had seen Ms. Lewinsky.
 [6] Once this thing was in Drudge, and there was this argument
 [7] about whether it was or was not going to be in Newsweek, that
 [8] was a clear signal to me, because Newsweek, frankly, was —
 [9] had become almost a sponsoring media outlet for the Paula
 [10] Jones case, and had a journalist who had been trying, so far
 [11] fruitlessly, to find me in some sort of wrongdoing.
 [12] And so I knew this was all going to come out. I
 [13] was trying — I did not know at the time — I will say again,
 [14] I did not know that any of you were involved. I did not know
 [15] that the Office of Independent Counsel was involved. And I
 [16] was trying to get the facts and try to think of the best
 [17] defense we could construct in the face of what I thought was
 [18] going to be a media onslaught.
 [19] Once you became involved, I told Betty Currie not
 [20] to worry, that, that she had been through a terrible time.
 [21] She had lost her brother. She had lost her sister. Her
 [22] mother was in the hospital. I said, Betty, just don't worry
 [23] about me. Just relax, go in there and tell the truth.
 [24] You'll be fine. Now, that's all there was in this context.
 [25] Q Did the conversations that you had with Mrs.

Page 141

[1] Currie, this conversation, did it refresh your recollection
 [2] as to events involving Ms. Lewinsky?
 [3] A Well, as I remember, I do believe, in fairness,
 [4] that, you know, she may have felt some ambivalence about how
 [5] to react, because there were some times when she seemed to
 [6] say yes, when I'm not sure she meant yes. There was a time
 [7] — it seems like there was one or two things where she said,
 [8] well, remember this, that or the other thing, which did
 [9] reflect my recollection.
 [10] So, I would say a little yes, and a little no.
 [11] Q Why was it then that two or three days later, given
 [12] that The Washington Post article came out on January 21st,
 [13] why would you have had another conversation with Betty Currie
 [14] asking or making the exact same statements to her?
 [15] A I don't know that I did. I remember having this
 [16] one time. I was, I was — I don't know that I did.
 [17] Q If Mrs. Currie says you did, are you disputing
 [18] that?
 [19] A No, sir, I'm not disputing —
 [20] MR. KENDALL: Excuse me. Is your representation
 [21] that she testified that that conversation was — when?
 [22] MR. BITTMAN: I'm not making a representation as to
 [23] what Mrs. Currie said. I'm asking the President if Mrs.
 [24] Currie testified two or three days later, that two or three
 [25] days after the conversation with the President on January

Page 142

[1] 18th, that he called her into the Oval Office and went over
 [2] the exact same statements that the President made to her on
 [3] the 18th.
 [4] BY MR. BITTMAN:
 [5] Q Is that accurate? Is that a truthful statement by
 [6] Mrs. Currie, if she made it?
 [7] A I do not remember how many times I talked to Betty
 [8] Currie or when. I don't. I can't possibly remember that. I
 [9] do remember, when I first heard about this story breaking,
 [10] trying to ascertain what the facts were, trying to ascertain
 [11] what Betty's perception was. I remember that I was highly
 [12] agitated, understandably, I think.
 [13] And then I remember when I knew she was going to
 [14] have to testify to the grand jury, and I, I felt terrible
 [15] because she had been through this loss of her sister, this
 [16] horrible accident Christmas that killed her brother, and her
 [17] mother was in the hospital. I was trying to do — to make
 [18] her understand that I didn't want her to, to be untruthful to
 [19] the grand jury. And if her memory was different from mine,
 [20] it was fine, just go in there and tell them what she thought.
 [21] So, that's all I remember.
 [22] BY MR. BENNETT:
 [23] Q Mr. President, my name is Jackie Bennett. If I
 [24] understand your current line of testimony, you are saying
 [25] that your only interest in speaking with Ms. Currie in the

Page 143

[1] days after your deposition was to refresh your own
 [2] recollection?
 [3] A Yes.
 [4] Q It was not to impart instructions on how she was to
 [5] recall things in the future?
 [6] A No, and certainly not under oath. That — every
 [7] day, Mr. Bennett, in the White House and in every other
 [8] political organization when you are subject to a barrage of
 [9] press questions of any kind, you always try to make the best
 [10] case you can consistent with the facts; that is, while being
 [11] truthful.
 [12] But — so, I was concerned for a day or two there
 [13] about this as a press story only. I had no idea you were
 [14] involved in it for a couple of days.
 [15] I think Betty Currie's testimony will be that I
 [16] gave her explicit instructions or encouragement to just go in
 [17] the grand jury and tell the truth. That's what I told her to
 [18] do and I thought she would.
 [19] Q Mr. President, when did you learn about the Drudge
 [20] Report reporting allegations of you having a sexual
 [21] relationship with someone at the White House?
 [22] A I believe it was the morning of the 18th, I think.
 [23] Q What time of day, sir?
 [24] A I have no idea.
 [25] Q Early morning hours?

Page 144

[1] A Yeah, I think somebody called me and told me about
 [2] it. Maybe Bruce, maybe someone else. I'm not sure. But I
 [3] learned early on the 18th of the Drudge Report.
 [4] Q Very early morning hours, sir?
 [5] A Now, my deposition was on the 17th, is that right?
 [6] Q On Saturday, the 17th, sir.
 [7] A Yeah, I think it was when I got up Sunday morning.
 [8] I think. Maybe it was late Saturday night. I don't
 [9] remember.
 [10] Q Did you call Betty Currie, sir, after the Drudge
 [11] Report hit the wire?
 [12] A I did.
 [13] Q Did you call her at home?
 [14] A I did. Was that the night of the 17th?
 [15] Q Night of the 17th, early morning hours of the 18th?
 [16] A Okay, yes. That's because — yes. I worked with
 [17] Prime Minister Netanyahu that night until about midnight.
 [18] MR. KENDALL: Wait.
 [19] THE WITNESS: Isn't that right?
 [20] MR. KENDALL: Excuse me. I think the question is
 [21] directed — Mr. Bennett, if you could help out by putting the
 [22] day of the week, I think that would be helpful.
 [23] BY MR. BENNETT:
 [24] Q Saturday night, Sunday morning.
 [25] A Yes. I called Betty Currie as soon — I think

Page 145

[1] about as soon as I could, after I finished with Prime
 [2] Minister Netanyahu, and in the aftermath of that meeting
 [3] planning where we were going next in the Middle East peace
 [4] process.
 [5] MR. KENDALL: Can we take a two-minute break,
 [6] please?
 [7] MR. BITTMAN: May I ask one other question first,
 [8] Mr. Kendall?
 [9] MR. KENDALL: Certainly. I think the witness is
 [10] confused on dates. That's all.
 [11] MR. BITTMAN: Okay.
 [12] THE WITNESS: That's what — I didn't think it was
 [13] the night of the 17th.
 [14] MR. KENDALL: Mr. President, I think we'll do it in
 [15] a break.
 [16] THE WITNESS: Can we have a break and I could get
 [17] straightened out?
 [18] MR. BITTMAN: Sure. May I ask one other quick —
 [19] this is a question I forgot to ask from the grand jurors.
 [20] THE WITNESS: I don't want to get mixed up on these
 [21] dates now. Go ahead.
 [22] BY MR. BITTMAN:
 [23] Q This is — they wanted to know whether, they want
 [24] us to clarify that the President's knowledge, your knowledge,
 [25] Mr. President, as to the approach to our office this morning;

Page 146

[1] that is, we were told that you would give a general statement
 [2] about the nature of your relationship with Ms. Lewinsky,
 [3] which you have done. Yet that you would -- you did not want
 [4] to go in any of the details about the relationship. And that
 [5] if we pressed on going into the details, that you would
 [6] object to going into the details.
 [7] And the grand jurors, before they wanted, they
 [8] wanted to vote on some other matters, they wanted to know
 [9] whether you were aware of that? That we were told that?
 [10] MR. KENDALL: Well, Mr. Bittman, who told you that?
 [11] This is, this is, this is not a fair question, when you say
 [12] you were told. Who told you?
 [13] MR. BITTMAN: Who told me what, the question?
 [14] MR. KENDALL: You said, you said the grand jury was
 [15] told.
 [16] MR. BITTMAN: We have kept the grand jury informed,
 [17] as we normally would, of the proceedings here.
 [18] MR. KENDALL: Right. And, I'm sorry. Who, who are
 [19] you representing told you or the grand jurors anything? Is
 [20] that, is that our conversation?
 [21] MR. BITTMAN: Yes.
 [22] MR. STARR: Yes, our conversation.
 [23] MR. BITTMAN: Yes. That was in substance related
 [24] to the grand jurors.
 [25] THE WITNESS: And what's your question to me, Mr.

Page 147

[1] Bittman?
 [2] BY MR. BITTMAN:
 [3] Q Whether you were aware of the facts that I just
 [4] described?
 [5] A Yes, sir. Let me say this. I knew that Mr.
 [6] Kendall was going to talk with Judge Starr. What we wanted
 [7] to do was to be as helpful as we could to you on the question
 [8] of whether you felt I was being truthful, when I said I did
 [9] not have sexual relations with Ms. Lewinsky, as defined in
 [10] that definition (1) in this, in my testimony.
 [11] And I thought the best way to do that, and still
 [12] preserve some measure of privacy and dignity, would be to
 [13] invite all of you and the grand jurors to ask, well, would
 [14] you consider this, that, or the other thing covered by the
 [15] definition. You asked me several questions there, and I did
 [16] my best to answer whether I thought they were covered by the
 [17] definition, and said if I thought they were covered, you
 [18] could conclude from that that my testimony is I did not do
 [19] them.
 [20] If those things, if things are not covered by the
 [21] definition, and I don't believe they are covered, then I
 [22] could not -- then they shouldn't be within this discussion
 [23] one way or the other.
 [24] Now, I know this is somewhat unusual. But I would
 [25] say to the grand jury, put yourself in my position. This is

Page 148

[1] not a typical grand jury testimony. I, I have to assume a
 [2] report is going to Congress. There's a videotape being made
 [3] of this, allegedly because only one member of the grand jury
 [4] is absent. This is highly unusual. And, in addition to
 [5] that, I have sustained a breathtaking number of leaks of
 [6] grand jury proceedings.
 [7] And, so, I think I am right to answer all the
 [8] questions about perjury, but not to say things which will be
 [9] forever in the historic annals of the United States because
 [10] of this unprecedented videotape and may be leaked at any
 [11] time. I just think it's a mistake.
 [12] And, so, I'm doing my best to cooperate with the
 [13] grand jury and still protect myself, my family, and my
 [14] office.
 [15] MR. BITTMAN: Thank you.
 [16] MR. KENDALL: This will be two minutes.
 [17] (Whereupon, the proceedings were recessed from 5:37 p.m.
 [18] until 5:43 p.m.)
 [19] BY MR. BENNETT:
 [20] Q Mr. President, before we broke, we were talking
 [21] about the sequencing of your conversations with Betty Currie
 [22] following your deposition on Saturday, January 17th. Do you
 [23] recall that?
 [24] A I do.
 [25] Q All right. And you recall contacting Betty Currie,

Page 149

[1] calling her and instructing her on the evening of Saturday
 [2] night, after your deposition, and telling her to come in the
 [3] next day?
 [4] A Yes, sir, I do.
 [5] Q Sunday was normally her day off, isn't that so?
 [6] A Yes, it was.
 [7] Q And so you were making special arrangements for her
 [8] to come back into the White House, isn't that so?
 [9] A Well, yes. I asked her to come back in and talk to
 [10] me.
 [11] Q And it was at that time that you spoke with her,
 [12] and Mr. Bittman and Mr. Wisenberg have asked you questions
 [13] about what you said in that conversation, isn't that so?
 [14] A Yes, they have -- I don't know whether that's the
 [15] time, but they -- I did talk to her as soon as I realized
 [16] that the deposition had become more about Monica Lewinsky
 [17] than Paula Jones. I asked her, you know, if she knew
 [18] anything about this. I said, you know, it's obvious that
 [19] this is going to be a matter of press speculation, and I was
 [20] trying to go through the litany of what had happened between
 [21] us, and asked some questions.
 [22] Q On fairness, it would be more than a matter of
 [23] simple press speculation, isn't that so? Mr. President,
 [24] there was a question about whether you had testified fully,
 [25] completely, and honestly on the preceding day in your

Page 150

[1] deposition.
 [2] A Well, actually, Mr. Bennett, I didn't think about
 [3] that then. I -- this has been a rather unprecedented
 [4] development, and I wasn't even thinking about the Independent
 [5] Counsel getting into this. So, at that moment, I knew
 [6] nothing about it and I was more interested in what the facts
 [7] were and whether Ms. Currie knew anything about it, knew
 [8] anything about what Monica Lewinsky knew about it.
 [9] Q Mr. President, you've told us at least a little bit
 [10] about your understanding of how the term sexual relations was
 [11] used, and what you understood it to mean in the context of
 [12] your deposition. Isn't that correct?
 [13] A That is correct.
 [14] Q And you've told us -- I mean, that was a lawsuit
 [15] Paula Jones filed in which she alleged that you asked her to
 [16] perform oral sex, isn't that so?
 [17] A That was her allegation.
 [18] Q That was her allegation. And, notwithstanding that
 [19] that was her allegation, you've testified that you understood
 [20] the term sexual relations, in the context of the questions
 [21] you were being asked, to mean something else, at least
 [22] insofar as you were the recipient rather than the performer?
 [23] A Sir, Paula Jones' lawyers pulled out that
 [24] definition, not me. And Judge Susan Webber Wright ruled on
 [25] it, just as she later ruled their case had no merit in the

Page 151

[1] first place, no legal merit, and dismissed it.
 [2] I had nothing to do with the definition. I had
 [3] nothing to do with the Judge's rulings. I was simply there
 [4] answering the questions they put to me, under the terms of
 [5] reference they imposed.
 [6] Q Well, the grand jury would like to know, Mr.
 [7] President, why it is that you think that oral sex performed
 [8] on you does not fall within the definition of sexual
 [9] relations as used in your deposition.
 [10] A Because that is -- if the deponent is the person
 [11] who has oral sex performed on him, then the contact is with
 [12] -- not with anything on that list, but with the lips of
 [13] another person. It seems to be self-evident that that's what
 [14] it is. And I thought it was curious.
 [15] Let me remind you, sir, I read this carefully. And
 [16] I thought about it. I thought about what "contact" meant. I
 [17] thought about what "intent to arouse or gratify" meant.
 [18] And I had to admit under this definition that I'd
 [19] actually had sexual relations with Gennifer Flowers. Now, I
 [20] would rather have taken a whipping than done that, after all
 [21] the trouble I'd been through with Gennifer Flowers, and the
 [22] money I knew that she had made for the story she told about
 [23] this alleged 12-year affair, which we had done a great deal
 [24] to disprove.
 [25] So, I didn't like any of this. But I had done my

Page 152

(1) best to deal with it and the -- that's what I thought. And I
 (2) think that's what most people would think, reading that.
 (3) Q Would you have been prepared, if asked by the Jones
 (4) lawyers, would you have been prepared to answer a question
 (5) directly asked about oral sex performed on you by Monica
 (6) Lewinsky?
 (7) A If the Judge had required me to answer it, of
 (8) course, I would have answered it. And I would have answered
 (9) it truthfully, if I --
 (10) Q By the way, do you believe that the --
 (11) A -- had been required.
 (12) Q -- Jones litigants had the same understanding of
 (13) sexual relations that you claim you have?
 (14) A I don't know what their understanding was, sir. My
 (15) belief is that they thought they'd get this whole thing in,
 (16) and that they were going to -- what they were trying to do is
 (17) do just what they did with Gennifer Flowers. They wanted to
 (18) find anything they could get from me or anyone else that was
 (19) negative, and then they wanted to leak it to hurt me in the
 (20) press, which they did even though the Judge ordered them not
 (21) to.
 (22) So, I think their --
 (23) Q Wouldn't it -- I'm sorry.
 (24) A I think their position, Mr. Bennett -- you asked
 (25) the question -- their position was, we're going to cast the

Page 153

(1) widest net we can and get as much embarrassing stuff as we
 (2) can, and then dump it out there and see if we can make him
 (3) bleed. I think that's what they were trying to do.
 (4) Q Don't you think, sir, that they could have done
 (5) more damage to you politically, or in whatever context, if
 (6) they had understood the definition in the same way you did
 (7) and asked the question directly?
 (8) A I don't know, sir. As I said, I didn't work with
 (9) their lawyers in preparing this case. I knew the case was
 (10) wrong. I knew what our evidence was. By the time of this
 (11) deposition, they knew what their evidence was.
 (12) Their whole strategy was, well, our lawsuit's not
 (13) good, but maybe we can hurt him with the discovery. And, you
 (14) know, they did some. But it didn't amount to much.
 (15) And did I want, if I could, to avoid talking about
 (16) Monica Lewinsky? Yes, I'd give anything in the world not to
 (17) be here talking about it. I'd be giving -- I'd give anything
 (18) in the world not to have to admit what I've had to admit
 (19) today.
 (20) But if you look at my answer in the Flowers [sic]
 (21) deposition, at least you know I tried to carefully fit all my
 (22) answers within the framework there, because otherwise there
 (23) was no reason in the wide world for me to do anything other
 (24) than make the statements I'd made about Gennifer Flowers
 (25) since 1991, that I did not have a 12-year affair with her,

Page 154

(1) and that these, the following accusations she made are false.
 (2) So, that's all I can tell you. I can't prove
 (3) anything.
 (4) Q But you did have a great deal of anxiety in the
 (5) hours and days following the end of your deposition on the
 (6) 17th. Isn't that fair to say?
 (7) A Well, I had a little anxiety the next day, of
 (8) course, because of the Drudge Report. And I had an anxiety
 (9) after the deposition because it was more about Monica
 (10) Lewinsky than it was about Paula Jones.
 (11) Q The specificity of the questions relating to Monica
 (12) Lewinsky alarmed you, isn't that fair to say?
 (13) A Yes, and it bothered me, too, that I couldn't
 (14) remember the answers. It bothered me that I couldn't -- as
 (15) Mr. Wisenberg pointed out, it bothered me that I couldn't
 (16) remember all the answers. I did the best I could. And so I
 (17) wanted to know what the deal was. Sure.
 (18) Q Mr. President, to your knowledge, have you turned
 (19) over, in response to the grand jury subpoenas, all gifts that
 (20) Monica Lewinsky gave you?
 (21) A To my knowledge, I have, sir. As you know, on
 (22) occasion, Mr. Kendall has asked for your help in identifying
 (23) those gifts. And I think there were a couple that we came
 (24) across in our search that were not on the list you gave us,
 (25) that I remembered in the course of our search had been given

Page 155

(1) to me by Monica Lewinsky and we gave them to you.
 (2) So, to the best of my knowledge, we have given you
 (3) everything we have.
 (4) Q Can you explain why, on the very day that Monica
 (5) Lewinsky testified in the grand jury on August 6th of this
 (6) year, you wore a necktie that she had given you?
 (7) A No, sir, I don't believe I did. What necktie was
 (8) it?
 (9) Q The necktie you wore on August 6th, sir.
 (10) A Well, I don't know that it was a necktie that
 (11) Monica Lewinsky gave me. Can you describe it to me?
 (12) Q Well, I don't want to take time at this point, but
 (13) we will provide you with photographic evidence of that, Mr.
 (14) President.
 (15) A If you give me -- I don't believe that's accurate,
 (16) Mr. Bennett.
 (17) Q So, let me ask the question --
 (18) A But if you give it to me, and I look at it and I
 (19) remember that she gave it to me, I'll be happy to produce it.
 (20) I do not believe that's right.
 (21) Q Well, if you remember that she gave it to you, why
 (22) haven't you produced it to the grand jury?
 (23) A I don't remember that she gave it to me. That's
 (24) why I asked you what the tie was. I have --
 (25) Q Can you --

Page 156

(1) A -- no earthly idea. I believe that, that I did not
 (2) wear a tie she gave me on August the 6th.
 (3) Q Can you tell us why Bayani Nelvis wore a tie that
 (4) Monica Lewinsky had given you on the day he appeared in the
 (5) grand jury?
 (6) A I don't know that he did.
 (7) Q Have you given Bayani Nelvis any ties, sir?
 (8) A Oh, yes, a lot of ties.
 (9) Q And so if he wore the tie that you gave him, that
 (10) Monica Lewinsky had given you, that would not have been by
 (11) design, is that what you are telling us?
 (12) A Oh, absolutely not. Let me --
 (13) Q You are not --
 (14) A May I explain, Mr. Bennett? It won't --
 (15) Q Yes.
 (16) A -- take long. Every year, since I've been
 (17) President, I've gotten quite a large number of ties, as you
 (18) might imagine. I get, I have a couple of friends, one in
 (19) Chicago and one in Florida who give me a lot of ties, a lot
 (20) of other people who send me ties all the time, or give them
 (21) to me when I see them.
 (22) So, I always have the growing number of ties in my
 (23) closet. What I normally do, if someone gives me a tie as a
 (24) gift, is I wear it a time or two. I may use it. But at the
 (25) end of every year, and sometimes two times a year, sometimes

Page 157

(1) more, I go through my tie closet and I think of all the
 (2) things that I won't wear a lot or that I might give away, and
 (3) I give them mostly to the men who work there.
 (4) I give them to people like Glen and Nelvis, who
 (5) work in the kitchen, back in the White House, or the
 (6) gentlemen who are my stewards or the butlers, or the people
 (7) who run the elevators. And I give a lot of ties away a year.
 (8) I'll bet I -- excluding Christmas, I bet I give 30, 40, maybe
 (9) more ties away a year, and then, of course, at Christmas, a
 (10) lot.
 (11) So, there would be nothing unusual if, in fact,
 (12) Nelvis had a tie that originally had come into my tie closet
 (13) from Monica Lewinsky. It wouldn't be unusual. It wouldn't
 (14) be by design. And there are several other people of whom
 (15) that is also true.
 (16) Q Mr. President, I'd like to move to a different area
 (17) right now. I'd like to ask you some questions about Kathleen
 (18) Willey. You met Kathleen Willey during your 1992 campaign,
 (19) isn't that so?
 (20) A Yes, sir, I did.
 (21) Q As a matter of fact, you first saw her at a rope
 (22) line at the Richmond, Virginia airport on October 13, 1992,
 (23) is that not correct?
 (24) A I don't believe that is correct.
 (25) Q When did you first meet her, sir?

Page 158

[1] A Well, let me ask you this. When was the debate in
 [2] Richmond?
 [3] Q I believe it was October 13, 1992, sir.
 [4] A Well, I believe that I had met her -- I believe I
 [5] had met her before then, because Governor Wilder, I believe
 [6] that was his last year as governor -- I think that's right,
 [7] 92-93. I believe that I met her in connection with her
 [8] involvement with Governor Wilder.
 [9] And I have the impression -- it's kind of a vague
 [10] memory, but I have the impression that I had met her once
 [11] before, at least once before I came to that Richmond debate.
 [12] Now, I'm not sure of that.
 [13] Q Well, at least if you had met her before --
 [14] A But I am quite sure she was at the Richmond debate
 [15] and I did meet her there. I'm quite sure of that.
 [16] Q Mr. President, you've seen television footage of
 [17] you standing on a rope line with Donald Beyer, Lt. Governor
 [18] Donald Beyer --
 [19] A I have.
 [20] Q -- asking Mr. Beyer for the name of Kathleen
 [21] Willey? You've seen that footage, haven't you?
 [22] A I don't know that I've seen it, but I am aware that
 [23] it exists.
 [24] Q All right. And you can see him, you can read his
 [25] lips. He's saying the name Kathleen Willey in response to a

Page 159

[1] question from you, isn't that so?
 [2] A That's what I've heard.
 [3] Q And, as a matter of fact, you sent Nancy Hemreich,
 [4] who was present on that day, to go get her telephone number,
 [5] didn't you, sir?
 [6] A I don't believe so.
 [7] Q You don't believe so?
 [8] A Well, let me say this. If that is true, then I'm
 [9] quite certain that I had met her before. I would never call
 [10] someone out of the blue that I saw on a rope line and send
 [11] Nancy Hemreich to get her number to do it.
 [12] Q Even if you were just learning her name for the
 [13] first time?
 [14] A That's correct. I'm not so sure that I didn't ask
 [15] Don Beyer, if he was on the rope line with me, who she was
 [16] because I thought I had seen her before or I knew I had seen
 [17] her before and I didn't remember her name. Now, I do that
 [18] all the time. For men --
 [19] Q Mr. President --
 [20] A -- and women.
 [21] Q I'm sorry. Do you recall that you sent Nancy
 [22] Hemreich for her telephone number?
 [23] A No, I don't.
 [24] Q All right. Do you recall, having received her
 [25] telephone number, calling her that night?

Page 160

[1] A No, sir, I don't.
 [2] Q Do you recall inviting her to meet with you at your
 [3] hotel that night?
 [4] A No, sir, I do not.
 [5] Q Do you recall where you stayed in Richmond,
 [6] Virginia during the debates you've told us about?
 [7] A Well, I stayed at some hotel there, I believe.
 [8] Q Actually, did you stay at the Williamsburg Inn, not
 [9] in Richmond?
 [10] A Yeah, that's right. We prepared in Williamsburg.
 [11] That's correct. I believe we prepared in Williamsburg and
 [12] then went to Richmond for the debate, and then I think we
 [13] spent the night in Richmond. And the next day, I think we
 [14] had a rally before we left town. I believe that's right.
 [15] Q Do you know of any reason Kathleen Willey's
 [16] telephone number would appear on your toll records from your
 [17] room in Williamsburg?
 [18] A No, there --
 [19] Q If you didn't call her?
 [20] A No, I'm not denying that I called her, sir. You
 [21] asked me a specific question. I won't deny that I called
 [22] her. I don't know whether I did or not.
 [23] Q As a matter of fact, you called her twice that day,
 [24] didn't you, sir?
 [25] A I don't recall. I may well have done it and I

Page 161

[1] don't know why I did it.
 [2] Q Well, does it refresh your recollection that you
 [3] called her and invited her to come to your room that night,
 [4] sir?
 [5] A I don't believe I did that, sir.
 [6] Q If Kathleen Willey has said that, she's mistaken or
 [7] lying, is that correct, Mr. President?
 [8] A I do not believe I did that. That's correct.
 [9] Q But what is your best recollection of that
 [10] conversation, those conversations?
 [11] A I don't remember talking to her. But I -- it seems
 [12] to me that at some point -- this is why I believe I had met
 [13] her before, too. But at some point I had some actual person-
 [14] to-person conversation with her about my sore throat, or what
 [15] she thought would be good for it, or something like that. I
 [16] have some vague memory of that. That's it.
 [17] Q Is this the chicken soup conversation, Mr.
 [18] President?
 [19] A Well, I don't know if I would -- maybe that's what
 [20] she said I should have. I don't remember. But I have no
 [21] recollection, sir, of asking her to come to my room. I --
 [22] and I -- I'm sorry, I don't. I can't -- I won't deny calling
 [23] her. I don't know if I did call her. I don't know if she
 [24] tried to call me first. I don't know anything about that.
 [25] I, I just -- I met her and Doug Wilder. I remember that she

Page 162

[1] and her husband were active for Government Wilder, and that's
 [2] about all I remember, except that I had a conversation with
 [3] her around the Richmond debate. I do remember talking to her
 [4] there.
 [5] Q Mr. President, let's move ahead to the episode on
 [6] November 29, 1993, in which Mrs. Willey met you in your
 [7] office at the Oval, the subject matter of the "60 Minutes"
 [8] broadcast a few months ago. You recall that episode?
 [9] A I certainly do.
 [10] Q Mr. President, in fact, on that date you did make
 [11] sexual advances on Kathleen Willey, is that not correct?
 [12] A That's false.
 [13] Q You did grab her breast, as she said?
 [14] A I did not.
 [15] Q You did place your hand on her groin area, as she
 [16] said?
 [17] A No, I didn't.
 [18] Q And you placed her hand on your genitals, did you
 [19] not?
 [20] A Mr. Bennett, I didn't do any of that, and the
 [21] questions you're asking, I think, betray the bias of this
 [22] operation that has troubled me for a long time. You know
 [23] what evidence was released after the "60 Minutes" broadcast
 [24] that I think pretty well shattered Kathleen Willey's
 [25] credibility. You know what people down in Richmond said

Page 163

[1] about her. You know what she said about other people that
 [2] wasn't true. I don't know if you've made all of this
 [3] available to the grand jury or not.
 [4] She was not telling the truth. She asked for the
 [5] appointment with me. She asked for it repeatedly.
 [6] Q Did she make a sexual advance on you, Mr.
 [7] President?
 [8] A On that day, no, she did not. She was troubled.
 [9] Q On some other day?
 [10] A I wouldn't call it a sexual advance. She was
 [11] always very friendly. But I never took it seriously.
 [12] Q Mr. President, you mentioned the documents that
 [13] were released and information that came out from people in
 [14] Richmond, et cetera, after the "60 Minutes" piece was
 [15] broadcast. As a matter of fact, you were required, under the
 [16] Court's rulings, to produce those documents in response to
 [17] document requests by the Jones litigants, isn't that correct?
 [18] A No. I believe the Jones litigants' request for
 [19] production of documents to me ran to documents that were in
 [20] my personal files and in my personal possessions, and did not
 [21] cover documents that were White House files. So, I don't
 [22] believe we were required to produce them.
 [23] As a matter of fact, when that story first ran,
 [24] sir, before "60 Minutes", back in July or so of '97, I was
 [25] aware that we had some letters. I didn't -- I didn't

Page 164

(1) remember that she'd written us as much as she had and called
(2) as much as she had, and asked to see me as often as she had,
(3) after this alleged incident. I didn't know the volume of
(4) contact that she had which undermined the story she has told.
(5) But I knew there was some of it.
(6) And I made a decision that I did not want to
(7) release it voluntarily after the Newsweek ran the story,
(8) because her friend Julie Steele was in the story saying she
(9) asked her -- she, Kathleen Willey -- asked her to lie. And
(10) because, frankly, her husband had committed suicide. She
(11) apparently was out of money. And I thought, who knows how
(12) anybody would react under that. So, I didn't.
(13) But, now when "60 Minutes" came with the story and
(14) everybody blew it up, I thought we would release it. But I
(15) do not believe we were required to release White House
(16) documents to the Jones lawyers.
(17) Q Mr. President, have you made a decision on whether
(18) to stay beyond the four hours we agreed to, to accept
(19) questions from the grand jury?
(20) MR. KENDALL: We have made an agreement, Mr.
(21) Bennett, to give you four hours. We're going to do that. By
(22) my watch, there are about 12 minutes left.
(23) MR. BENNETT: I guess that's no. Is that correct,
(24) Mr. Kendall?
(25) MR. KENDALL: Yes, that's correct.

Page 165

(1) THE WITNESS: May I ask this question? Could I
(2) have a two-minute break?
(3) MR. BENNETT: Sure.
(4) THE WITNESS: I'm sorry to bother you with this. I
(5) know we're getting to the end, but I need a little break.
(6) (Whereupon, the proceedings were recessed from 6:04 p.m.
(7) until 6:09 p.m.)
(8) BY MR. STARR:
(9) Q Mr. President, at various times in this
(10) investigation, officials have invoked executive privilege in
(11) response to questions that have been posed to them by the
(12) grand jury and in the grand jury. One of the grand jurors
(13) has posed the question, did you personally authorize the
(14) invocation of executive privilege?
(15) A If the answer is authorized, I think the answer to
(16) that would be yes. But I would like the grand jury to know
(17) something.
(18) In the cases where we raised the lawyer/client
(19) privilege, or executive privilege, or where the Secret
(20) Service raised their privilege, and when I say -- I had
(21) nothing to do with that. I did not authorize it, approve it,
(22) or anything else. That was something they asked to be free
(23) to make their decision on by themselves.
(24) In none of those cases did I actually have any
(25) worry about what the people involved would say. The reason

Page 166

(1) those privileges were advanced and litigated was that I
(2) believed that there was an honest difference between Judge
(3) Starr and the Office of Independent Counsel, and Mr. Ruff, my
(4) counsel, and I about what the proper balance was in the
(5) Constitutional framework.
(6) And I did not want to put the Presidency at risk of
(7) being weakened as an institution, without having those
(8) matters litigated. Now, we've lost some of those matters.
(9) Our people have testified and the grand jury is free to
(10) conclude whether they believe that the testimony they gave
(11) was damaging to me. But I don't, I don't imagine it was and
(12) I wasn't worried about it. It was an honest difference of
(13) Constitutional principal between Judge Starr and the Office
(14) of Independent Counsel and the White House.
(15) Q Mr. President, a couple of very brief questions,
(16) given our time. The White House's outside counsel, Mr.
(17) Eggleston, withdrew the White House's appeal from Chief Judge
(18) Johnson's ruling that the invocation of executive privilege
(19) had to give way to the grand jury's right to the information,
(20) that ruling in connection with the testimony of Mr.
(21) Blumenthal and Mr. Lindsey.
(22) Were you informed of that fact that the appeal had
(23) been withdrawn?
(24) A I was informed of it and, as a matter of fact, I
(25) was consulted about it and I strongly supported it. I didn't

Page 167

(1) want to appeal it.
(2) Q Okay.
(3) A It was -- I had -- my main difference, Judge Starr,
(4) as you know with you, is, and with some of the Court
(5) decisions, is on the extent to which members of the White
(6) House Counsel's staff, like Mr. Lindsey, should be able to
(7) counsel the President on matters that may seem like they are
(8) private, like the Jones case, but inevitably intrude on the
(9) daily work of the President.
(10) But I didn't really want to advance an executive
(11) privilege claim in this case beyond having it litigated, so
(12) that we, we had not given up on principal this matter,
(13) without having some judge rule on it. So, I made --
(14) Q Excuse me. And you are satisfied that you now have
(15) the benefit of that ruling, is that correct?
(16) A Well, yes. I just didn't want to, I didn't want to
(17) -- yes. And I didn't -- I made the -- I actually, I think,
(18) made the call, or at least I supported the call. I did not,
(19) I strongly felt we should not appeal your victory on the
(20) executive privilege issue.
(21) MR. STARR: Thank you.
(22) BY MR. WISENBERG:
(23) Q Mr. President, among the many remaining questions
(24) of the grand jurors is one that they would like answered
(25) directly without relation to, without regard to inferences,

Page 168

(1) which is the following: Did Monica Lewinsky perform oral sex
(2) on you? They would like a direct answer to that, yes or no?
(3) A Well, that's not the first time that question's
(4) been asked. But since I believe, and I think any person,
(5) reasonable person would believe that that is not covered in
(6) the definition of sexual relations I was given, I'm not going
(7) to answer, except to refer to my statement.
(8) I had intimate contact with her that was
(9) inappropriate. I do not believe any of the contacts I had
(10) with her violated the definition I was given. Therefore, I
(11) believe I did not do anything but testify truthfully on these
(12) matters.
(13) Q We have a couple of photos of the tie that you
(14) wore.
(15) A Would you please give them to me?
(16) Q Yes.
(17) A Now, this is August 6th, is that correct?
(18) Q 1998, the day that Monica Lewinsky appeared at the
(19) grand jury. And my question to you on that is, were you
(20) sending some kind of a signal to her by wearing --
(21) A No, sir.
(22) Q -- one of the ties -- let me finish, if you don't
(23) mind, sir.
(24) A Sure. I'm sorry. My apology.
(25) Q Were you sending some kind of a signal to her by

Page 169

(1) wearing a tie she had given you on the day that she appeared
(2) in front of the grand jury?
(3) A No, sir. I don't believe she gave me this tie.
(4) And if I was sending a signal, I'm about to send a terrible
(5) signal, and maybe you ought to invite her to talk again. I
(6) don't, I don't want to make light about this. I don't
(7) believe she gave me this tie. I don't remember giving her
(8) giving me this tie. And I had absolutely no thought of this
(9) in my mind when I wore it.
(10) If she did, I, I, I, I don't remember it, and this
(11) is the very first I've ever heard of it.
(12) Q Did you realize when you --
(13) MR. WISENBERG: Can I just have for the record,
(14) what are the exhibit numbers?
(15) MS. WIRTH: Yes. They should be WJC-5 and 6.
(16) (Grand Jury Exhibits WJC-5
(17) and WJC-6 were marked for
(18) identification.)
(19) MR. WISENBERG: Mr. Bennett has some more
(20) questions.
(21) BY MR. BENNETT:
(22) Q Mr. President, we were talking about your responses
(23) to document requests in the Jones litigation, and I had just
(24) asked you about turning over the Kathleen Willey
(25) correspondence. Do you recall that?

Page 170

(1) A Yes, sir, I do.
 (2) Q And, if I understand your testimony, you did not
 (3) believe that the request for documents compelled you to
 (4) search for those documents in the White House?
 (5) A Mr. Bennett, I want to answer this question in a
 (6) way that is completely satisfactory to you and the grand
 (7) jury, without violating the lawyer/client privilege, which is
 (8) still intact.
 (9) It was my understanding that in the request for
 (10) production of documents, that those requests ran against and
 (11) operated against my personal files. Now, I have some
 (12) personal files in the White House. And, I'm sorry. In this
 (13) case I'm not my own lawyer, and I don't know how the
 (14) distinction is made between files which are the personal
 (15) files of the President, and files which are White House
 (16) files.
 (17) But I do have a very clear memory that we were
 (18) duty-bound to search and turn over evidence or, excuse me,
 (19) documents that were in my personal file, but not in the White
 (20) House files. And I believe that the letters to which you
 (21) refer, Ms. Willey's letters and Ms. Willey's phone messages,
 (22) were in the White House files. And, therefore, I was
 (23) instructed at least that they were, that we had fully
 (24) complied with the Jones lawyers' request, and that these
 (25) documents were outside the request.

Page 171

(1) Q Mr. President, you're not contending that White
 (2) House documents, documents stored in the fashion that these
 (3) were stored, are beyond your care, custody or control, are
 (4) you?
 (5) A Mr. Bennett, that may be a legal term of art that I
 (6) don't have the capacity to answer. I can only tell you what
 (7) I remember. I remember being told in no uncertain terms that
 (8) if these were personal files of the President, we had to
 (9) produce documents. If they were essentially White House
 (10) files, we were not bound to do so. So, we didn't.
 (11) Q So, you are saying somebody told you that you
 (12) didn't have to produce White House documents?
 (13) A That's --
 (14) MR. KENDALL: I'm going to caution the witness that
 (15) this question should not invade the sphere of the
 (16) attorney/client privilege, and any conversations with counsel
 (17) are privileged.
 (18) THE WITNESS: Let me say, and maybe, Mr. Kendall,
 (19) we need a break here. I'm not trying -- I'm trying to avoid
 (20) invading the lawyer/client privilege.
 (21) I can just tell you that I did, I did the best I
 (22) could to comply with this. And eventually we did make, of
 (23) course, all of this public. And it was damaging to Ms.
 (24) Willey and her credibility. It was terribly damaging to her.
 (25) And the first time she came out with this story, I didn't do

Page 172

(1) it. I only did it when they went back on "60 Minutes" and
 (2) they made this big deal of it.
 (3) It turned out she had tried to sell this story and
 (4) make all this money. And, I must say, when I saw how many
 (5) letters and phone calls and messages there were that totally
 (6) undercut her account, I, myself, was surprised.
 (7) BY MR. BENNETT:
 (8) Q But you knew there were letters?
 (9) A I did, sir.
 (10) Q And the White House --
 (11) A I knew that --
 (12) Q -- is under your control, isn't it, Mr. President?
 (13) A Well, Mr. Bennett, again, I'm not trying to be --
 (14) some days I think it's under my control and some days I'm not
 (15) so sure.
 (16) But, if you're asking me, as a matter of law, I
 (17) don't want to discuss that because that's -- I mean, I'll be
 (18) glad to discuss it, but I'm not the person who should make
 (19) that decision. That decision should be made by someone who
 (20) can give me appropriate advice, and I don't want to violate
 (21) the lawyer/client privilege here.
 (22) Q Well, Mr. President, how are the letters from
 (23) Kathleen Willey that surfaced after the "60 Minutes" episode
 (24) aired any different from the correspondence and other
 (25) matters, tangible items, tangible things, of Monica Lewinsky?

Page 173

(1) A Well, the items you asked for from Monica Lewinsky
 (2) that I produced to you, you know that there was a tie, a
 (3) coffee cup, a number of other things I had. Then I told you
 (4) there were some things that had been in my possession that I
 (5) no longer had, I believe. I don't remember if I did that.
 (6) There was one book, I remember, that I left on vacation last
 (7) summer.
 (8) Q The same documents that the Jones litigants had
 (9) asked you for?
 (10) A Yes. But, at any rate, they were different. They
 (11) were in my -- the gifts were in my personal possession,
 (12) clearly.
 (13) Q In your office at the Oval?
 (14) A Well, in the books, now, the Presidential books
 (15) were with my other books that belong to me personally. They
 (16) were in the Oval.
 (17) Q Where do you draw the line, sir, between personal
 (18) and White House? Now, you are talking about some documents
 (19) that are in the Oval Office and we don't see where you are
 (20) drawing the line.
 (21) A Well, Mr. Bennett, I don't think these -- I think
 (22) the Lewinsky gifts were all non-documents. And you can --
 (23) MR. KENDALL: Is that the time?
 (24) THE WITNESS: Just a moment.
 (25) MR. KENDALL: Excuse me, Mr. Bennett.

Page 174

(1) THE WITNESS: Well, I'd like to --
 (2) MR. KENDALL: You've got thirty more seconds.
 (3) THE WITNESS: -- finish answering the question,
 (4) please, because this is a legitimate question, I think.
 (5) There is somebody in the White House, Mr. Bennett,
 (6) who can answer your question, and you could call them up and
 (7) they could answer it, under oath, for you. There is some way
 (8) of desegregating what papers are personal to the President
 (9) and what papers are part of the White House official archives
 (10) papers. And I don't know how the distinction is made. I
 (11) just don't know.
 (12) BY MR. BENNETT:
 (13) Q Did you direct personnel, Nancy Hemreich or anyone
 (14) else, to make a search for correspondence from Kathleen
 (15) Willey and Monica Lewinsky when those documents were called
 (16) for in the Jones litigation, sir? Did you direct that
 (17) somebody on the White House staff look for those documents?
 (18) A I don't believe that I was in charge of doing that.
 (19) the document search, sir. So, the strict answer to that
 (20) question is that I didn't.
 (21) Q So, you sat back and relied on this legalistic
 (22) distinction between your personal, which you are in control
 (23) of, and the White House which, by the way, you are also in
 (24) control of, is that not correct?
 (25) MR. KENDALL: I won't object to the argumentative

Page 175

(1) form of the question. We'll allow the witness to answer it.
 (2) We're now over time, even the 30 seconds. So, this will be
 (3) it.
 (4) THE WITNESS: Mr. Bennett, I haven't said this all
 (5) day long, but I would like to say it now.
 (6) Most of my time and energy in the last five and a
 (7) half years have been devoted to my job. Now, during that
 (8) five and a half years, I have also had to contend with things
 (9) no previous President has ever had to contend with: a
 (10) lawsuit that was dismissed for lack of legal merit, but that
 (11) cost me a fortune and was designed to embarrass me; this
 (12) independent counsel inquiry, which has gone on a very long
 (13) time and cost a great deal of money, and about which serious
 (14) questions have been raised; and a number of other things.
 (15) And, during this whole time, I have tried as best I
 (16) could to keep my mind on the job the American people gave me.
 (17) I did not make the legal judgment about how the documents
 (18) were decided upon that should be given to the Jones lawyers,
 (19) and ones that shouldn't.
 (20) And, I might add that Ms. Willey would have been
 (21) very happy that these papers were not turned over, because
 (22) they damaged her credibility so much, had they not ultimately
 (23) been turned over after she made, I think, the grievous error
 (24) of going on "60 Minutes" and saying all those things that
 (25) were not true.

Page 176

[1] But I did not make the decision. It was not my
 [2] job. This thing is being managed by other people. I was
 [3] trying to do my job.

[4] BY MR. BENNETT:

[5] Q Mr. President, the grand jury, I am notified, still
 [6] has unanswered questions of you, and we appeal to you again
 [7] to make yourself available to answer those questions.

[8] MR. KENDALL: Mr. Bennett, our agreement was for
 [9] four hours and we have not counted the break time against
 [10] that, and I think that will be --

[11] THE WITNESS: You know, Mr. Bennett, I wish I could
 [12] do it. I wish the grand jurors had been allowed to come here
 [13] today as we invited them to do. I wanted them down here. I
 [14] wanted them to be able to see me directly. I wanted them to
 [15] be able to ask these questions directly. But, we made an
 [16] agreement that was different, and I think I will go ahead and
 [17] stick with the terms of it.

[18] BY MR. BENNETT:

[19] Q The invitation was made after there was political
 [20] fallout over the deposition circumstances with the satellite
 [21] transmission and the taping. Isn't that so?

[22] A I don't know about the taping, Mr. Bennett. I
 [23] understood that the prospect of the grand jurors coming down
 [24] here was raised fairly early. I don't know.

[25] Q Just for the record --

Page 0

[1] A But, anyway, I wish they could have. I respect the
 [2] grand jury. I respect the --

[3] MR. WISENBERG: Just for the record, the invitation
 [4] to the grand jury was contingent upon us not videotaping, and
 [5] we had to videotape because we have an absent grand juror.

[6] MR. KENDALL: Is that the only reason, Mr.
 [7] Wisenberg, you have to videotape?

[8] THE WITNESS: Well, yes. Do you want to answer
 [9] that?

[10] MR. BITTMAN: Thank you, Mr. President.
 [11] (Whereupon, at 6:25 p.m., the proceedings were concluded.)

[12]
 [13] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

[14] I, Elizabeth A. Eastman, the officer before whom
 [15] the foregoing proceedings were taken, do hereby certify that
 [16] the witness whose testimony appears in the foregoing was duly
 [17] sworn by me; that the testimony of said witness was taken by
 [18] me electronically and thereafter reduced to typewriting by
 [19] me; that this is a true record of the testimony given by said
 [20] witness; that I am neither counsel for, related to, nor
 [21] employed by any of the parties to the action in which this
 [22] deposition was taken; and, further, that I am not a relative
 [23] or employee of any attorney or counsel employed by the
 [24] parties hereto, nor financially or otherwise interested in
 [25] the outcome of the action.

Concordance Report

Unique Words: 2,140

Total Occurrences:
11,523Total Words in File:
39,820

Single File Concordance

Case Sensitive

Cover Pages = 1

Includes ALL Text
Occurrences

Dates ON

Includes Pure Numbers

Possessive Forms ON

-- DATES --

April [1] 30:25

April of 1996 [1] 32:19

August 6th [3] 155:5, 9;
168:17August the 6th [1]
156:2December [9] 31:1, 4;
46:20; 73:25; 116:18;
118:4, 7; 123:1, 2

December, 1997 [2]

83:12; 91:15

December 5th [2] 83:9;
84:20December 6th, 1997 [1]
83:9

December 17th [2]

116:4; 119:7

December 19, 1997 [1]
42:7

December 19th [5]

42:12; 43:8; 62:14; 76:2;
123:15December 28 [3] 41:8;
43:14; 127:8December 28, 1997 [1]
34:16

December 28th [4]

43:18; 47:22; 51:17;
114:17December 28th, 1997
[2] 33:9, 13

February [2] 31:1, 4

February of 1997 [1]
136:24

January [11] 17:19;

32:19; 112:12; 118:7;

123:2; 126:12, 19; 127:5,
12, 21

January 7th [1] 74:7

January 13th, 1998 [1]
111:18

January 17, 1998 [1]

16:14

January 17th [1]

148:22

January 17th, 1998 [4]

7:12; 9:9; 10:4, 23

January 18 [1] 53:16

January 18th [3]

131:21; 139:17; 141:25

January 21st [3]

107:14; 108:4; 141:12

January 21st, 1998 [1]

100:24

January 23rd, 1998 [1]

101:1

January the 13th, 1998

[1] 111:14

July [1] 163:24

May [1] 156:14

November [1] 31:19

November 29, 1993 [1]

162:6

October 13, 1992 [2]

157:22; 158:3

-- \$ --

\$40-million-investigation

[1] 108:13

-- 1 --

1 [14] 13:9; 20:14, 22;

96:5; 97:10; 98:3, 11, 15,

21; 99:4; 100:14; 147:10

10 [2] 8:10; 31:8

12 [3] 8:10; 74:22;

164:22

12-year [2] 151:23;

153:25

13 [2] 157:22; 158:3

13th [4] 111:14, 18;

112:9, 11

14th [2] 112:9, 11

15 [1] 138:5

16 [3] 74:17, 20, 24

17 [1] 16:14

17th [13] 7:12; 9:9; 10:4,

23; 116:4; 119:7; 144:5,

6, 14, 15; 145:13; 148:22;

154:6

18 [1] 53:16

18th [8] 54:25; 131:21;

139:17; 142:1, 3; 143:22;

144:3, 15

19 [5] 13:20; 14:11, 14,

19; 42:7

1991 [1] 153:25

1992 [3] 157:18, 22;

158:3

1993 [1] 162:6

1996 [10] 10:1; 32:19;

54:13; 124:15, 16;

129:14; 130:3; 135:22;

136:4; 137:1

1997 [23] 10:1, 8; 33:10,

13; 34:8, 16; 42:7; 51:3;

54:8; 83:9, 12; 84:20;

91:15; 129:15, 22;

133:12, 20; 134:1, 8;

135:24; 136:23, 24;

137:2

1998 [11] 7:12; 9:9;

10:5, 23; 16:14; 100:24;

101:2; 111:14, 17, 18;

168:18

19th [11] 42:12, 24;

43:8, 9, 10; 62:15, 23;

73:25; 76:3; 123:15

1:14 [2] 11:11, 12

1:30 [3] 11:13, 14, 15

-- 2 --

2 [10] 13:12; 17:20;

21:11; 52:2; 97:25; 98:1,

10; 125:13

20 [3] 39:4; 62:17; 138:6

21 [1] 14:15

21st [4] 100:24; 107:14;

108:4; 141:12

22 [1] 66:14

23 [1] 14:22

23rd [1] 101:1

25 [1] 68:3

28 [4] 34:16; 41:8;

43:14; 127:8

28th [10] 33:9, 13; 37:3;

43:18, 22; 44:6, 10;

47:22; 51:17; 114:17

29 [1] 162:6

2:00 [1] 116:6

2:38 [3] 58:8, 9, 11

2:48 [2] 58:10, 11

-- 3 --

3 [2] 13:12; 66:14

30 [9] 109:22, 25; 110:1;

125:21, 22, 23, 24; 157:8;

175:2

3:38 [2] 92:7, 8

-- 4 --

4 [1] 24:25

40 [1] 157:8

4:01 [2] 92:9, 10

4:49 [2] 125:10, 11

-- 5 --

5 [4] 8:9; 42:20; 52:2;

58:18

53 [1] 20:10

54 [5] 19:21; 20:7, 14,

21; 58:18

55 [2] 125:13, 15

5:05 [1] 125:12

5:37 [1] 148:17

5:43 [1] 148:18

5th [3] 83:9; 84:20; 85:5

-- 6 --

6 [2] 4:3; 169:15

60 [8] 162:7, 23; 163:14,

24; 164:13; 172:1, 23;

175:24

603 [1] 6:22

68 [3] 41:18; 66:14; 68:4

69 [2] 41:11; 66:14

6:04 [1] 165:6

6:09 [1] 165:7

6:25 [1] 177:11

6th [14] 83:9; 84:24;

85:2, 5, 7, 12; 91:15;

116:21, 22; 155:5, 9;

156:2; 168:17

-- 7 --

72 [1] 74:17

75 [1] 52:1

7th [1] 74:8

-- 9 --

92-93 [1] 158:7

95 [1] 31:19

96 [5] 30:25; 38:24;

39:2; 50:14; 131:10

97 [9] 31:1; 32:24;

38:25; 39:3; 118:7; 123:2;

131:12; 163:24

98 [2] 118:8; 123:2

-- A --

a.m. [2] 101:2; 116:6

ability [3] 10:19; 112:25;

135:2

able [8] 89:20; 120:19;

121:25; 135:8; 137:10;

167:6; 176:14, 15

absent [2] 148:4; 177:5

Absolutely [6] 9:24;

38:14; 80:12; 120:20;

124:2; 136:18

absolutely [10] 20:18;

22:5; 25:4; 46:13; 58:20;

103:7; 117:7; 134:9;

156:12; 169:8

abusive [1] 17:13

accept [1] 164:18

accepted [3] 47:13;

48:8, 20

access [3] 52:22; 53:13;

68:20

accident [1] 142:16

according [1] 65:9

account [1] 172:6

accounts [1] 121:22

accurate [13] 14:21;

20:24; 22:15; 25:14; 42:3;

45:14; 101:24; 121:15;

132:7; 134:10; 142:5;

155:15

accurately [1] 7:9

accusations [1] 154:1

achieve [2] 94:3, 16

acknowledge [3] 39:8;

99:17; 132:17

acknowledged [3]

40:11; 66:1; 102:18

action [2] 177:21, 25

actions [1] 10:13

active [1] 162:1

activities [1] 15:24

activity [11] 15:25; 16:4,

8; 17:21; 53:19; 61:19;

79:18; 93:4, 11; 98:8, 9

actor [1] 16:1

acts [2] 16:13; 136:20

actual [1] 161:13

add [3] 139:10, 15;

175:20

addition [2] 74:1; 148:4

address [7] 54:9; 55:5,

7; 102:5; 137:18; 138:4,

10

addressed [1] 111:5

admit [5] 24:1; 81:4;

151:18; 153:18

admitted [1] 17:17

advance [4] 9:11;

163:6, 10; 167:10

advanced [1] 166:1

advances [1] 162:11

advantage [1] 27:23

advantaged [1] 72:16

advice [2] 47:12; 172:20

Advisor [1] 31:25

affair [5] 49:4; 101:11;

106:4; 151:23; 153:25

Affairs [7] 32:7; 111:24;

112:24; 113:2; 114:12;

129:4; 130:8

affect [2] 138:24; 139:7

affecting [1] 10:16

affectionate [6] 48:7,

19, 24; 49:6; 131:15;

affidavit [35] 20:17;

21:15, 20; 22:3, 13; 23:1,

5, 7, 23; 24:12, 13; 25:2;

58:19; 70:2; 73:13; 74:2,

5, 6, 8, 12; 75:8; 77:12,

14, 15; 78:9, 17; 80:11;

82:25; 117:25; 120:11,

20, 21, 22; 121:3; 127:4

affidavits [1] 116:13

affirmative [1] 39:10

afraid [2] 80:2; 114:2

aftermath [2] 105:12;

145:2

afternoon [9] 3:15, 16;

9:2, 3; 11:18

- 89:24; 96:24; 104:13, 16;
19; 115:13; 118:17; 134:4
agreed [1] 164:18
agreement [4] 4:6;
164:20; 176:8, 16
aid [1] 110:24
aides [1] 100:23
aired [1] 172:24
airport [1] 157:22
alarmed [1] 154:12
allegation [3] 150:17,
18, 19
allegations [1] 143:20
alleged [4] 10:24;
150:15; 151:23; 164:3
allegedly [1] 148:3
allow [1] 175:1
allowed [3] 5:15; 53:19;
176:12
alone [22] 9:25; 30:12,
15; 32:5, 11; 34:16;
57:18, 22, 23, 25; 93:2;
132:2, 15; 133:6, 20;
134:5, 7, 8, 16; 138:5, 13
amazed [1] 72:23
ambitions [1] 47:15
ambivalence [1] 141:4
America [2] 73:8, 9
American [1] 175:16
Americans [3] 22:16;
23:15; 121:8
amount [2] 40:5; 153:14
amounting [1] 94:7
anger [2] 85:15, 18
angry [4] 85:10, 13;
124:6, 10
Anita [2] 121:19; 122:14
annals [1] 148:9
Answer [2] 66:19; 68:6
answer [93] 5:24; 6:4;
7:7, 9, 18, 21; 8:23;
10:19; 14:24; 24:16;
28:17, 20; 29:12; 30:1,
16; 41:24, 25; 51:16;
52:3; 58:4; 61:15; 62:5;
67:5, 6; 70:21, 25; 72:1,
3, 6; 73:2, 18; 74:23;
75:1; 76:6; 77:25; 78:2;
80:2, 14; 81:21; 88:5, 6;
92:21; 93:12, 19, 22, 25;
94:9; 97:24; 99:1, 12;
100:15; 103:6, 12, 24, 25;
104:21, 22, 24; 105:16;
109:6, 17, 18, 24, 25;
110:25; 112:1; 126:5, 6,
8; 127:1; 128:5, 17;
138:21; 147:16; 148:7;
152:4, 7; 153:20; 165:15;
168:2, 7; 170:5; 171:6;
174:6, 7, 19; 175:1;
176:7; 177:8
answered [7] 71:17, 20;
73:3; 139:22; 152:8;
167:24
answering [9] 41:16,
17; 52:24; 69:8; 84:1;
100:19; 109:8; 151:4;
174:3
answers [14] 8:11, 17;
28:5; 67:19, 20, 22;
103:23; 109:19; 122:8;
128:21; 153:22; 154:14,
16
antique [1] 36:15
anxiety [3] 154:4, 7, 8
anybody [21] 14:4;
24:1; 28:3; 47:5; 54:14;
70:14; 72:13; 87:14;
88:13; 89:15, 17; 90:9,
14; 91:21; 106:20;
106:15; 107:20; 129:16;
136:3; 164:12
anytime [1] 118:4
Anyway [2] 32:2; 75:3
anyway [3] 48:13;
127:21; 177:1
anywhere [1] 133:14
apart [1] 21:2
apologize [1] 9:10
apologized [1] 130:23
apology [1] 168:24
Apparently [1] 125:19
apparently [4] 18:12;
85:12; 104:13; 164:11
appeal [5] 166:17, 22;
167:1, 19; 176:6
Appeals [1] 5:3
appear [1] 160:16
appeared [4] 17:15;
156:4; 168:18; 169:1
appearing [1] 4:5
appears [3] 31:5; 80:1;
177:16
APPERSON [1] 3:2
Apperson [1] 3:6
application [1] 5:3
appointment [1] 163:5
apprehensive [1] 48:22
approach [1] 145:25
approached [2] 54:24;
84:7
appropriate [5] 90:4,
16, 18; 136:1; 172:20
approval [1] 4:7
approve [1] 165:21
approximate [1] 60:9
approximately [4] 31:6;
32:21, 22; 116:5
April [2] 30:25; 32:19
archives [1] 174:9
area [10] 58:14; 109:11;
110:7, 19, 24; 122:7;
137:7, 16; 157:16; 162:15
areas [4] 15:20; 16:10,
15; 99:11
argue [2] 97:25; 104:19
argument [2] 30:5;
140:6
argumentative [1]
174:25
arouse [16] 15:21;
16:11, 17, 21; 18:3; 95:1,
16; 96:4, 13; 97:21;
98:20; 100:2, 3; 139:4;
151:17
arrange [2] 86:15;
128:14
arranged [2] 128:2, 13
arrangement [1] 5:17
arrangements [1] 149:7
art [1] 171:5
article [2] 107:14;
141:12
ascertain [2] 142:10
asking [21] 17:10, 17;
26:3; 44:17; 70:24; 76:10;
77:17; 90:10, 12, 20, 25;
112:18; 128:8; 133:19;
137:5; 141:14, 23;
158:20; 161:21; 162:21;
172:16
aspects [1] 74:1
assigned [1] 32:1
assume [5] 53:3, 8, 9;
83:5; 148:1
assumed [2] 133:22
assumption [1] 82:20
assured [1] 130:6
attached [1] 131:9
attempt [2] 67:21;
131:23
attention [9] 17:15;
25:8, 17; 26:2; 59:12;
60:2; 61:9; 62:9; 126:12
attitude [1] 79:2
Attorney [1] 5:4
attorney [16] 4:6; 8:7;
9:4; 13:21; 14:16, 22;
19:11; 20:4; 24:24; 58:16,
22; 60:12; 128:1, 2;
171:16; 177:23
attorneys [14] 3:22;
4:17; 5:10, 15, 17; 20:7;
28:13; 41:19; 66:17; 68:4;
69:18; 71:19; 91:8
August [4] 155:5, 9;
156:2; 168:17
authority [1] 5:3
authorize [3] 4:20;
165:13, 21
authorized [3] 4:19; 8:6;
165:15
available [3] 113:10;
163:3; 176:7
avoid [4] 37:8; 77:9;
153:15; 171:19
awaken [1] 6:25
aware [15] 20:16; 23:20;
43:14, 15, 17; 58:17, 18;
60:24; 88:21; 127:3;
135:25; 146:9; 147:3;
158:22; 163:25
awhile [2] 88:20; 114:5
8:1; 18:3, 4; 22:13; 48:20;
70:11; 78:16; 122:4; 166:2
believes [1] 122:20
belong [1] 173:15
belonging [2] 138:15;
139:9
benefit [3] 23:13; 70:3;
167:15
benefits [1] 123:5
BENNETT [10] 142:22;
144:23; 148:19; 164:23;
165:3; 169:21; 172:7;
174:12; 176:4, 18
Bennett [49] 8:4, 9;
19:11, 18; 20:4, 25;
21:14, 25; 25:7, 12, 23;
26:1; 27:5; 30:3; 58:16;
59:1; 60:17, 24; 61:5, 20;
62:8; 67:8, 24; 73:19;
79:24; 81:1; 83:15; 102:9;
142:23; 143:7; 144:21;
150:2; 152:24; 155:16;
156:14; 162:20; 164:21;
169:19; 170:5; 171:5;
172:13; 173:21, 25;
174:5; 175:4; 176:8, 11,
22
Bennett's [1] 59:25
besides [1] 24:14
bet [3] 22:21; 157:8
betray [1] 162:21
betrayed [2] 26:8; 69:12
Betty [42] 53:15, 25;
54:8, 16; 55:19; 56:17;
57:14; 75:2; 77:2; 85:15,
17, 19; 91:24; 105:25;
114:21; 115:2, 6; 117:4,
6, 8, 13, 17; 118:6;
119:10; 126:14, 19;
132:20; 133:12; 134:2,
19, 25; 135:12; 138:7;
140:19, 22; 141:13;
142:7; 143:15; 144:10,
25; 148:21, 25
Betty's [7] 55:21; 56:19;
116:7, 16; 127:7; 132:12;
142:11
Beyer [4] 158:17, 18,
20; 159:15
bias [1] 162:21
bit [7] 40:18; 48:11;
62:14; 66:16; 83:7;
113:13; 150:9
BITTMAN [33] 9:1;
11:15, 17, 21; 12:6, 13,
15, 16; 13:6; 14:13;
19:20, 24; 21:19; 41:14;
58:7; 125:15, 16, 22;
126:1; 127:10; 141:22;
142:4; 145:7, 11, 18, 22;
146:13, 16, 21, 23; 147:2;
148:15; 177:10
Bittman [27] 8:25; 9:3,
4, 15; 11:1, 19, 25; 12:10,
19; 14:12; 19:17; 27:6;
-- B --
bag [4] 34:21; 35:1, 6,
21
balance [1] 166:4
ball [1] 28:12
banter [1] 10:10
barrage [1] 143:8
Based [2] 31:2, 4
based [3] 30:19; 77:25;
109:24
basically [7] 4:16;
17:14; 95:15; 98:3;
124:20, 23; 134:20
basis [10] 20:8; 68:22;
93:19, 25; 103:22, 24;
104:1; 109:8
Bayani [2] 156:3, 7
bear [2] 35:20; 104:24
bear's [1] 35:7
bearing [4] 18:22;
104:12, 13, 15
bed [1] 115:9
begins [1] 20:13
begun [1] 19:23
behalf [1] 113:19
behave [1] 79:18
behavior [1] 17:13
belief [4] 39:6; 127:16;
137:24; 152:15
believe [137] 6:16; 8:16,
21; 12:23; 15:23; 18:5,
19; 20:3; 22:12, 15; 24:8,
10; 25:15; 26:6; 29:21,
25; 30:2, 8; 31:6, 10;
32:2; 33:12; 34:25;
36:25; 37:3; 39:1; 40:15;
41:10, 12, 16; 42:4, 16;
43:10; 49:12; 52:25; 54:7,
10; 59:24; 63:18; 64:10;
67:24, 25; 70:1; 73:17;
79:74; 75:13, 15, 22;
78:16; 80:11; 81:14;
84:23, 24; 85:5; 91:1;
93:10; 94:5, 11, 12, 13,
15; 95:13; 99:25; 100:10;
102:12, 14, 17, 19; 103:1,
104:23; 106:5; 111:6, 21,
24; 114:17, 23; 115:12;
116:18, 21; 121:6;
122:16; 123:20, 21;
128:8; 131:3; 132:24;
133:25; 134:3, 19;
136:11, 15, 23; 138:5, 6;
139:2, 22; 141:3; 143:22;
147:21; 152:10; 155:7;
15, 20; 156:1; 157:24;
158:3, 4, 5, 7; 159:6, 7;
160:7, 11, 14; 161:5, 8,
12; 163:18, 22; 164:15;
166:10; 168:4, 5, 9, 11;
169:3, 7; 170:3, 20;
173:5; 174:18
believed [12] 7:18, 21;

- 29:14; 34:5; 44:15; 45:5;
49:14; 55:6; 56:21; 57:25;
58:15; 125:18; 138:18;
140:2; 146:10; 147:1;
149:12
Black [3] 34:22; 35:2;
52:11
blame [2] 40:9; 92:25
blanket [1] 35:10
bleed [1] 153:3
blessed [1] 72:16
blew [2] 140:3; 164:14
blizzard [1] 101:9
blood [1] 138:19
blue [1] 159:10
Blumenthal [3] 105:24;
108:1; 166:21
blur [1] 105:13
board [1] 29:24
Bob [2] 11:14; 125:13
bodies [2] 16:2, 10
body [5] 16:16, 20;
18:2; 96:12; 139:4
bogus [3] 79:14, 15;
81:10
book [9] 36:14, 15;
52:13; 127:12, 16, 18;
130:15, 16; 173:6
books [5] 36:16; 45:1;
173:14, 15
bore [1] 18:12
Bosnia [1] 127:19
bother [3] 45:22; 47:21;
165:4
bothered [3] 154:13, 14,
15
bound [5] 8:1, 16; 19:4;
23:25; 171:10
Bowles [10] 105:24;
108:2; 111:15, 19, 22;
112:2, 6, 18, 19; 113:8
box [2] 35:16; 51:19
break [16] 5:18; 11:3, 9,
10; 56:25; 58:6, 7; 92:6;
125:9; 145:5, 15, 16;
165:2, 5; 171:19; 176:9
breaking [2] 105:12;
142:9
breaks [3] 122:23;
131:19, 20
breast [9] 94:20, 25;
95:8, 20; 96:21; 100:2, 4;
162:13
breasts [3] 109:11;
110:7, 15
breathtaking [1] 148:5
brief [3] 9:11; 42:17;
166:15
briefly [3] 5:13; 58:14;
114:16
bringing [5] 28:11;
117:4, 17; 118:6; 119:10
broach [1] 52:13
broad [2] 26:22; 118:9
broadcast [3] 162:8, 23;
163:15
broader [1] 80:20
broke [6] 104:6; 106:12;
107:14; 108:3; 116:9;
148:20
brother [5] 116:7, 17;
127:7; 140:21; 142:16
Bruce [12] 40:17; 41:25;
42:1, 4; 43:4; 67:11, 25;
68:11; 70:17; 73:20; 82:9;
144:2
Building [1] 113:23
burden [2] 73:14; 78:19
burdened [1] 124:22
busier [1] 63:25
business [2] 45:22;
89:15
butlers [1] 157:6
buy [2] 125:3, 4
- - C - -
- calculated [1] 6:25
calendar [2] 31:16;
32:25
California [1] 73:4
call [14] 49:2; 75:20;
116:15; 134:20; 144:10,
13; 159:9; 160:19;
161:23, 24; 163:10;
167:18; 174:6
calling [3] 149:1;
159:25; 161:22
calls [2] 110:20; 172:5
camera [1] 11:11
campaign [1] 157:18
Canada [1] 35:8
canvas [1] 34:21
capacity [1] 171:6
Captain [2] 91:23, 25
card [1] 49:19
cards [10] 47:25; 48:4,
6, 10, 12, 14; 49:8, 12;
50:7
care [3] 71:13; 89:18;
171:3
cared [1] 130:21
careful [5] 50:10;
101:12, 24; 107:18;
108:10
carefully [6] 30:4;
59:23; 99:15, 23; 151:15;
153:21
carry [1] 112:7
Carter [4] 64:10, 11;
73:23; 75:22
carving [1] 35:7
case [68] 5:6; 8:14, 19,
22; 9:9; 13:21; 17:9; 18:8;
20:2; 22:10, 11; 24:21;
26:8, 12, 13, 25; 27:2;
28:11, 14; 33:16; 36:20;
41:20, 23; 47:8; 51:24;
56:24; 57:9; 59:17; 66:12,
19, 25; 67:18; 68:6; 70:5;
71:20; 74:3, 25; 75:8, 13;
79:5; 83:12; 94:25; 95:11;
97:2, 11; 99:11; 115:14,
15; 119:23; 120:16, 17,
18; 123:10; 124:1;
131:22; 132:6; 136:7;
137:19; 140:10; 143:10;
150:25; 153:9; 167:8, 11;
170:13
cases [5] 26:18; 29:1;
100:7; 165:18, 24
cast [1] 152:25
catch [1] 82:4
caught [1] 40:8
caused [1] 51:8
caution [1] 171:14
certainty [2] 38:25;
56:22
CERTIFICATE [1]
177:13
certify [1] 177:15
cetera [1] 163:14
chance [1] 70:4
change [1] 28:2
changed [2] 47:13; 51:3
characterization [2]
12:25; 46:17
characterize [1] 118:25
charge [2] 60:7; 174:18
charming [1] 88:23
check [1] 56:2
cherry [2] 35:16, 22
Chicago [1] 156:19
chicken [1] 161:17
Chief [4] 31:24; 32:3;
111:19; 166:17
chocolates [2] 35:16,
22
Christmas [16] 33:22,
24; 34:11; 36:13, 14;
44:25; 52:16; 126:13;
127:7, 17, 18, 20, 23;
142:16; 157:8, 9
cigar [1] 110:23
circle [1] 15:7
circled [1] 15:6
circuit [1] 28:10
circumstances [8] 47:2,
14; 51:3; 63:24; 70:3;
73:14; 78:18; 176:20
citizen [1] 122:3
civil [4] 8:21; 20:1;
26:18; 115:14
claim [3] 133:13;
152:13; 167:11
claims [1] 123:4
Clarence [2] 121:19;
122:15
clarification [1] 18:25
clarify [2] 6:19; 145:24
clear [11] 9:17; 12:20;
17:11, 18; 43:2, 3; 91:9;
129:22; 133:19; 140:8;
170:17
client [6] 59:10; 165:18;
170:7; 171:16, 20; 172:21
cling [1] 51:14
CLINTON [1] 3:9
Clinton [5] 3:19; 5:6;
20:19; 58:21; 59:3
closed [1] 135:6
closer [2] 51:14; 84:3
closest [1] 31:3
closet [3] 156:23; 157:1,
12
clothing [1] 95:4
cloudy [1] 40:19
cluttered [1] 63:25
coffee [1] 173:3
collected [1] 36:15
colloquy [1] 62:10
Columbia [1] 4:25
comfortable [2] 47:7;
117:24
coming [9] 31:22;
54:15; 117:3, 6, 9, 17;
118:6; 119:10; 176:23
comment [1] 25:19
comments [4] 21:2;
63:21; 101:16; 132:13
commit [1] 79:6
committed [4] 5:5;
104:12, 17; 164:10
common [3] 24:8; 95:5;
121:7
communication [1]
80:3
communications [1]
61:3
compelled [1] 170:3
compilation [1] 51:19
compiled [1] 170:24
complaining [2] 69:7;
80:5
complete [3] 7:7; 8:11;
119:2
completely [7] 25:14;
58:25; 59:8; 60:23; 135:5;
149:25; 170:6
complex [10] 54:10;
55:20; 56:12; 58:2;
113:22; 129:23; 132:23;
137:25; 138:14
complicate [1] 107:9
complicated [1] 55:11
comply [2] 47:3; 171:22
compounded [1] 72:21
concentrating [1] 60:18
concerned [14] 21:1;
46:12; 55:4, 14; 65:22;
72:4; 73:10; 82:24;
112:23; 119:17; 128:17;
129:15, 18; 143:12
concerning [1] 10:23
conclude [4] 94:14;
102:16; 147:18; 166:10
concluded [1] 177:11
conclusion [1] 94:10
conditions [1] 124:23
conduct [12] 10:2, 12;
12:23; 17:13; 46:5; 49:16;
86:16, 19; 92:15; 94:13;
104:23; 124:17
confidence [1] 38:6
confident [1] 112:22
confused [2] 78:4;
145:10
confusing [1] 40:24
Congress [1] 148:2
connection [4] 18:13;
118:10; 158:7; 166:20
connotes [1] 47:20
conscience [1] 6:25
consensual [1] 17:20
consider [4] 49:11;
62:18; 100:19; 147:14
considerations [1]
10:15
consist [1] 10:2
consistent [2] 42:23;
143:10
constant [2] 25:10;
79:12
constantly [1] 129:21
constitute [4] 10:3;
95:12; 97:22; 103:13
Constitutional [2]
166:5, 13
construct [1] 140:17
consult [2] 5:16, 19
consultation [1] 5:18
consulted [1] 166:25
contact [45] 10:6;
11:24; 12:5, 8, 17, 18;
15:19, 20; 16:2, 10, 15,
25; 17:25; 18:2; 24:18;
39:2, 5; 48:8, 21; 51:4;
54:2, 6; 55:9; 61:24;
92:18; 95:12, 13, 16, 17;
96:11, 12; 97:23; 98:4;
106:18; 124:9, 13; 125:1;
131:8; 134:9; 136:5;
138:25; 151:11, 16;
164:4; 168:8
contacted [3] 16:16, 20
contacting [1] 148:25
contacts [2] 11:23;
168:9
contain [1] 34:25
contend [2] 175:8, 9
contending [1] 171:1
content [2] 84:9, 12
context [21] 17:2; 18:7,
9, 14, 15; 37:5, 7; 38:5;
67:2; 109:1; 118:13;
119:2, 3; 120:3; 129:24;
132:4; 140:24; 150:11,
20; 153:5
contingent [1] 177:4
continue [1] 80:14
continued [2] 47:15;
48:3
continuously [1] 138:9
contrary [1] 105:20
control [5] 171:3;

172:12, 14; 174:22, 24
conversation [43] 26:3;
 31:18; 37:2; 39:7; 42:6;
 17; 43:6, 20; 44:3; 45:18;
 63:22; 64:6, 13, 16, 21;
 65:23; 111:9; 114:17, 20;
 116:5, 8; 117:1; 118:14;
 127:9, 25; 129:17, 25;
 130:11, 23; 139:16;
 141:1, 13, 21, 25; 146:20;
 22; 149:13; 161:10, 14,
 17; 162:2
conversations [14]
 10:9; 22:21; 42:25; 56:13;
 63:19, 20; 68:21; 84:9;
 85:19; 135:8; 140:25;
 148:21; 161:10; 171:16
convince [1] 83:2
convinced [1] 26:16
cooperate [1] 148:12
copy [9] 12:11, 12;
 13:7; 14:4, 5, 6; 20:12;
 42:9
corrected [1] 25:23
correctly [1] 20:12
correspondence [3]
 169:25; 172:24; 174:14
corrupt [1] 118:20
cost [2] 175:11, 13
COUNSEL [1] 3:13
Counsel [14] 3:11, 21,
 23; 4:7; 9:5; 20:16; 57:10;
 58:17, 18; 140:15; 150:5;
 166:3, 14
counsel [13] 8:4, 9, 14,
 19; 20:15; 61:3; 166:4,
 16; 167:7; 171:16;
 175:12; 177:20, 23
Counsel's [1] 167:6
counselor [1] 47:12
count [2] 5:19; 92:1
counted [1] 176:9
country [1] 26:24
couple [12] 32:6, 13;
 34:12; 35:13; 53:24;
 56:15; 101:8; 143:14;
 154:23; 156:18; 166:15;
 168:13
course [14] 13:24;
 36:23; 37:24, 25; 38:17;
 83:15; 107:8; 119:19;
 139:19; 152:8; 154:8, 25;
 157:9; 171:23
COURT [1] 177:13
Court [8] 4:24; 5:3;
 60:12; 74:16; 75:5; 77:24;
 122:1; 167:4
Court's [1] 163:16
courtroom [1] 3:24
cover [7] 4:17; 26:16;
 98:3, 12; 102:25; 119:12;
 163:21
covered [32] 16:5, 17,
 21; 17:25; 98:7, 8, 10;
 99:15, 24, 25; 100:4, 5, 9,
 11, 13; 102:4, 7, 13, 14,
 17, 19, 20; 105:1; 111:5,
 13; 147:14, 16, 17, 20,
 21; 168:5
covers [1] 15:19
credibility [3] 162:25;
 171:24; 175:22
crimes [1] 5:6
Criminal [1] 4:4
criminalize [1] 94:18
criticizing [1] 76:19
cross [1] 26:24
crowded [1] 73:6
cup [1] 173:3
curious [1] 151:14
current [1] 142:24
currently [1] 5:2
Currie [50] 51:18, 22;
 53:16, 18; 54:24; 55:2;
 57:2, 8, 14, 21; 85:15, 19;
 86:4, 7; 87:22; 105:25;
 108:1; 114:21; 115:2, 6,
 16; 126:14, 19; 131:20;
 133:5, 13, 19; 134:2, 21;
 135:18; 136:12, 17, 20;
 137:15; 139:17, 25;
 140:19; 141:1, 13, 17, 23,
 24; 142:6, 8, 25; 144:10,
 25; 148:21, 25; 150:7
Currie's [3] 91:24;
 137:21; 143:15
custody [1] 171:3
cute [1] 62:5

-- D --

daily [1] 167:9
damage [2] 28:12;
 153:5
damaged [1] 175:22
damaging [5] 39:25;
 78:14; 166:11; 171:23, 24
date [10] 44:4; 77:5, 7;
 112:4, 12, 13, 17; 131:17;
 133:18; 162:10
dates [2] 145:10, 21
day [58] 22:8; 31:16;
 32:16; 33:17; 36:11;
 46:19; 53:17; 60:20; 63:8,
 15, 22; 64:14; 73:1; 76:4;
 85:1, 22, 25; 86:6, 16, 19,
 22; 87:1, 3, 4, 8, 10, 12,
 23; 89:3; 90:6; 91:14;
 92:2; 100:25; 101:6;
 107:8; 126:22, 23; 134:1;
 143:7, 12, 23; 144:22;
 149:3, 5, 25; 154:7;
 155:4; 156:4; 159:4;
 160:13, 23; 163:8, 9;
 168:18; 169:1; 175:5
days [16] 65:1; 101:2, 8;
 104:5; 105:13; 106:12;
 112:8; 141:11, 24, 25;
 143:1, 14; 154:5; 172:14
dead [1] 132:8
deal [14] 27:1; 44:23;
 45:2; 59:12; 99:10; 109:2;
 116:3; 151:23; 152:1;
 154:4, 17; 172:2; 175:13
dealing [1] 122:6
death [1] 98:1
death [1] 116:7
debate [5] 158:1, 11,
 14; 160:12; 162:3
debates [1] 160:6
December [32] 31:1, 4;
 33:9, 13; 34:16; 41:8;
 42:7, 12; 43:8, 14, 18;
 46:20; 47:22; 51:17;
 62:14; 73:25; 76:2; 83:9,
 12; 84:20; 91:15; 114:17;
 116:4, 18; 118:4, 7;
 119:7; 123:1, 2, 15; 127:8
decide [1] 126:11
decided [3] 19:4; 59:15;
 175:18
decision [8] 48:20;
 59:18; 164:6, 17; 165:23;
 172:19; 176:1
decisions [1] 167:5
decline [1] 103:24
declining [6] 93:19, 25;
 100:15; 105:2, 6, 16
Defense [3] 112:23, 25;
 113:5
defense [1] 140:17
define [4] 23:24; 111:7;
 121:1; 134:7
defined [9] 10:4, 22;
 23:14; 96:4, 20; 103:14;
 107:6; 110:14; 147:9
definitely [1] 137:16
Definition [1] 97:11
definition [85] 7:24;
 12:24; 13:1, 10, 11, 18,
 21, 23, 24; 14:1, 17, 24;
 15:16, 18, 22, 23, 25;
 16:7, 9, 13, 14; 17:7, 19;
 18:7, 12, 13; 19:1, 3;
 21:12; 22:13, 15; 23:6;
 25; 24:5; 52:21; 71:10;
 93:4, 7, 11, 12, 13, 15;
 94:14, 22; 95:2, 6, 9, 18,
 21, 25; 96:5, 14; 97:1, 5,
 6, 19; 98:15, 21; 99:4, 5,
 17, 18; 102:4, 14, 15, 17,
 19, 20; 104:25; 105:1;
 108:14; 121:2; 139:2;
 147:10, 15, 17, 21;
 150:24; 151:2, 8, 18;
 153:6; 168:6, 10
definitions [1] 22:19
deliberate [1] 27:19
delicate [2] 99:11;
 103:6
delivered [1] 127:18
deluged [1] 132:13
denials [1] 101:22
denied [5] 102:8; 105:5;
 106:9, 11; 108:4
deny [9] 50:2; 74:9;
 105:9; 106:19; 112:9, 15;
 160:21; 161:22
denying [8] 36:5; 50:1;
 86:2; 101:20; 105:22, 25;
 108:5; 160:20
Department [3] 112:23,
 25; 113:5
depend [1] 89:13
depends [3] 23:18;
 59:5; 134:7
deplored [5] 81:7, 8, 9,
 12
deponent [3] 100:12;
 104:25; 151:10
deposed [12] 15:19;
 16:1, 19, 20; 18:1; 22:9;
 94:23; 95:8, 20; 96:2;
 102:13; 128:3
Deposition [1] 97:10
deposition [91] 7:13;
 8:3, 10; 9:8; 10:5, 23;
 12:24; 13:2, 8, 9, 20, 23,
 25; 14:3; 15:11; 16:23;
 19:6, 16, 21; 20:1, 12;
 21:24; 22:1; 25:11; 26:4,
 6; 27:10, 14; 29:2, 4, 6,
 14; 30:9; 31:20; 40:16,
 18, 21; 41:1; 46:2; 52:1,
 21; 53:17; 56:1; 58:17;
 59:16, 17; 60:4, 15;
 61:20, 23; 62:6; 66:20;
 74:14; 77:7, 8, 24; 78:9;
 79:13; 80:18; 81:5, 14;
 83:4; 84:4, 17; 93:6; 94:5,
 21; 95:24; 102:9, 24, 25;
 108:9; 109:1; 112:8;
 126:5, 13; 131:21; 143:1;
 144:5; 148:22; 149:2, 16;
 150:1, 12; 151:9; 153:11,
 21; 154:5, 9; 176:20;
 177:22
depositions [1] 80:24
Deputy [1] 3:20
describe [1] 155:11
described [1] 147:4
desegregating [1]
 174:8
design [2] 156:11;
 157:14
designed [1] 175:11
desire [6] 37:8; 96:4,
 25; 97:22; 98:20; 100:3
desperately [1] 40:4
detail [1] 67:16
detailed [1] 29:11
details [12] 9:7; 68:24;
 76:12, 23; 77:1, 11, 16;
 107:21; 118:1; 146:4, 5, 6
determination [1]
 100:20
determine [2] 56:10;
 134:18
determined [4] 27:19;
 81:13; 88:23; 136:1
development [1] 150:4
devoted [1] 175:7
died [2] 116:17; 127:7
difference [3] 166:2, 12;
 167:3
dignity [2] 10:17;
 147:12
dining [4] 56:16;
 132:20; 135:14; 137:6
dinner [1] 62:24
direct [11] 9:11; 17:25;
 95:13, 15; 96:11, 12;
 98:3; 104:20; 168:2;
 174:13, 16
directed [1] 144:21
disagree [2] 120:24;
 121:11
disclose [1] 37:20
disclosed [3] 38:4;
 50:8; 118:1
disclosing [1] 88:3
disconnect [1] 51:6
discovery [6] 26:11, 15;
 27:1; 47:7; 79:14; 153:13
discretion [1] 92:1
discuss [6] 36:21;
 62:24; 63:16; 92:23;
 172:17, 18
discussed [8] 36:19;
 73:22, 23, 24; 74:2, 15;
 90:14; 127:13
discusses [1] 6:22
Discussion [1] 11:20
discussion [7] 14:21;
 17:4, 6, 11; 25:7; 77:23;
 147:22
discussions [2] 13:15;
 25:10
dishonest [2] 78:22;
 99:20
dismissed [2] 151:1;
 175:10
disprove [1] 151:24
dispute [3] 63:7; 71:14;
 116:25
disputing [2] 141:17, 19
disrespectful [1] 110:3
dissatisfaction [1] 51:8
distinction [4] 60:25;
 170:14; 174:10, 22
distraught [2] 65:8;
 68:17
District [3] 4:24; 60:12
disturbing [2] 64:13, 16
Division [2] 89:4; 91:25
document [4] 24:25;
 163:17; 169:23; 174:19
documents [20] 163:12,
 16, 19, 21; 164:16; 170:3,
 4, 10, 19, 25; 171:2, 9,
 12; 173:8, 18; 174:15, 17;
 175:17
doesn't [8] 17:1; 18:11;
 45:13; 49:25; 68:8;
 138:23; 139:7

Dog [3] 34:22; 35:3; 52:11	20; 38:3, 8; 50:12, 22; 82:18; 118:1; 153:1	94:7; 115:14; 139:7; 153:10, 11; 155:13; 162:23; 170:18	expressing [1] 48:19	feed [1] 11:15
Don [1] 159:15	emotional [1] 130:24	evil [2] 118:20, 21	extended [1] 13:16	feel [2] 47:7; 60:14
Donald [2] 158:17, 18	empaneled [1] 4:23	exact [6] 13:7; 30:3; 60:18; 91:11; 141:14; 142:2	extent [2] 121:18; 167:5	feelings [2] 48:19; 49:22
door [4] 135:4, 5; 137:8, 9	employed [2] 177:21, 23	exactly [5] 57:19; 64:5; 86:18; 117:19; 128:11	extraordinary [1] 71:12	felon [1] 70:10
doors [1] 134:12	employee [3] 31:13; 32:7; 177:23	exaggerated [1] 99:20	extremely [3] 85:9; 101:3; 109:21	felt [13] 47:16; 48:23; 51:14; 73:12; 78:10; 82:7; 117:24; 120:10; 136:4; 141:4; 142:14; 147:8; 167:19
doorway [1] 91:24	employees [2] 31:14, 21	EXAMINATION [1] 3:13	-- F --	
doubt [8] 62:25; 63:17; 64:21; 74:10; 93:9; 106:11, 12; 138:13	employment [4] 23:13; 26:23; 32:23; 114:7	examination [1] 3:10	face [6] 28:24; 79:10, 11, 17; 140:17	field [1] 81:13
Doug [1] 161:25	encompassing [1] 62:3	examine [1] 94:4	fact [40] 11:5; 18:12; 28:3; 38:1, 15; 42:6; 48:8; 63:8; 65:8; 73:16; 77:1; 81:9; 87:13, 17; 89:9; 90:5; 91:12, 14; 104:20; 106:16; 108:17; 113:8; 116:2; 120:24; 123:18; 126:8; 130:7, 10; 133:1; 137:7; 139:19; 157:11, 21; 159:3; 160:23; 162:10; 163:15, 23; 166:22, 24	figure [3] 55:23; 140:4
downloading [1] 57:7	encounter [1] 65:17	examined [1] 3:11	facts [29] 17:16; 26:13; 29:25; 32:17; 37:9, 20; 38:1, 2; 51:7; 52:11; 55:10; 57:1; 59:17; 79:15; 82:17; 89:13; 119:3; 121:22; 123:22; 132:14; 139:11, 13; 140:4, 16; 142:10; 143:10; 147:3; 150:6	file [1] 170:19
dozens [1] 44:24	encounters [2] 10:2, 7	example [3] 16:5; 82:7; 120:1	feared [1] 17:16; 26:13; 29:25; 32:17; 37:9, 20; 38:1, 2; 51:7; 52:11; 55:10; 57:1; 59:17; 79:15; 82:17; 89:13; 119:3; 121:22; 123:22; 132:14; 139:11, 13; 140:4, 16; 142:10; 143:10; 147:3; 150:6	filed [3] 20:17; 58:19; 150:15
dragged [1] 37:12	encouraged [1] 47:3	except [4] 54:15; 89:1; 162:2; 168:7	factually [1] 120:12	files [12] 163:20, 21; 170:11, 12, 14, 15, 16, 20, 22; 171:8, 10
dragnet [2] 26:15; 37:13	encouragement [1] 143:16	exchange [2] 23:13; 59:13	fair [4] 135:18; 146:11; 154:6, 12	fill [1] 73:13
draw [3] 94:10; 126:12; 173:17	end [12] 13:17; 14:23; 21:25; 22:1; 48:15; 64:18; 19; 92:2; 110:1; 154:5; 156:25; 165:5	exclude [4] 15:24; 54:19, 23; 73:16	fair-minded [1] 78:18	filled [3] 22:12; 23:7, 9
drawing [1] 173:20	ended [3] 10:7; 48:3; 49:9	excluded [1] 16:3	fairly [1] 176:24	film [2] 138:1, 2
drawn [1] 22:18	ends [1] 134:13	excluding [1] 157:8	fairness [3] 100:6; 141:3; 149:22	financially [1] 177:24
dreamed [1] 49:21	enemies [1] 81:12	Excuse [8] 27:6; 77:10; 15; 97:13; 141:20; 144:20; 167:14; 173:25	faith [2] 20:8, 15	find [6] 27:8; 84:22; 86:21; 106:21; 140:11; 152:18
dress [2] 138:16; 139:9	energy [1] 175:6	excuse [10] 4:11; 11:25; 19:17; 25:23; 67:10; 72:10; 85:5; 98:22; 126:25; 170:18	fall [5] 95:17, 21; 96:13; 102:20; 151:8	finding [1] 40:6
Drudge [6] 132:11; 140:6; 143:19; 144:3, 10; 154:8	engage [2] 99:5; 101:4	execute [3] 78:17; 120:11, 21	fallout [1] 176:20	fine [2] 140:24; 142:20
duly [2] 3:11; 177:16	engaged [3] 10:1; 16:24; 136:19	executed [2] 117:25; 121:3	falls [3] 12:23; 93:11; 94:13	finish [8] 27:5; 41:25; 81:24, 25; 106:20; 124:15; 168:22; 174:3
dump [1] 153:2	engages [2] 15:11, 12	Executive [1] 113:23	false [6] 58:25; 59:4; 71:22; 120:21; 154:1; 162:12	finished [1] 145:1
duty [1] 7:1	engaging [1] 61:19	executive [6] 165:10; 14, 19; 166:18; 167:10, 20	falsehood [2] 102:2, 10	finishing [1] 67:6
duty-bound [1] 170:18	enjoy [1] 44:23	exercise [1] 7:25	familiar [5] 4:12; 13:25; 21:14; 40:7, 10	fire [1] 88:13
-- E --		Exhibit [12] 11:6, 7; 13:3, 4; 14:7, 9; 17:20; 21:11, 16, 17; 24:25; 97:10	family [4] 10:16; 72:18; 92:24; 148:13	fired [3] 87:9; 88:16, 17
Early [1] 143:25	ensuing [1] 65:1	exhibit [3] 13:8; 15:10; 169:14	family's [1] 102:23	First [5] 53:17; 64:18, 19; 65:24; 88:12
early [17] 10:1, 8; 38:25; 83:11, 12; 123:1, 2; 124:15, 16; 126:12, 19; 127:12; 144:3, 4, 15; 176:24	entering [1] 13:16	Exhibits [1] 169:16	famous [1] 35:11	first [51] 3:11; 9:6; 13:18; 15:9; 16:23; 17:25; 21:4; 26:20; 31:18; 33:2; 40:16, 18, 19; 42:2, 4; 43:4; 51:10; 54:7; 67:7, 9, 11, 23, 25; 68:3, 9; 70:15, 22; 72:6; 73:18; 79:21; 82:10; 83:11; 88:14, 18; 92:16; 119:5; 127:4; 132:4; 138:18; 142:9; 145:7; 151:1; 157:21, 25; 159:13; 161:24; 163:23; 168:3; 169:11; 171:25
earthly [1] 156:1	entitled [3] 8:12, 15, 20	Exhibitor [1] 54:22	fascination [1] 65:22	fit [2] 97:1; 153:21
East [1] 145:3	enumerate [1] 46:7	Exhibitor [1] 54:22	fashion [1] 171:2	five [6] 32:21; 70:8, 9; 125:19; 175:6, 8
Eastman [1] 177:14	enumerated [1] 15:20	existing [1] 47:9	fault [1] 139:1	fixated [1] 66:1
educated [1] 30:17	episode [3] 162:5, 8; 172:23	exists [1] 158:23	FBI [1] 70:9	fixation [2] 64:17; 68:18
effect [14] 13:10; 88:8; 90:7, 22, 24; 91:3, 6, 16; 104:6; 107:20; 114:18, 24; 117:16; 118:5	error [1] 175:23	expect [1] 56:23	February [3] 31:1, 4; 136:24	floor [1] 152:19
effort [3] 10:16; 22:20; 118:19	Erskine [11] 105:24; 108:2; 111:15, 19, 21; 112:2, 6, 18, 19; 113:3; 114:14	expectation [1] 72:9	Federal [2] 4:4; 6:22	flow [1] 67:2
Eggleston [1] 166:17	essentially [1] 171:9	experience [4] 19:15; 37:17; 44:20; 45:22	federal [6] 19:14, 15, 25; 26:23; 29:24; 31:21	Flowers [6] 99:19; 151:19, 21; 152:17; 153:20, 24
Eleanor [3] 85:9; 87:2; 89:2	establish [2] 55:15, 19	explain [9] 21:7; 48:25; 69:21; 70:25; 71:2; 83:4; 138:16; 155:4; 156:14		focus [2] 15:8; 30:6
elections [1] 130:3	et [1] 163:14	explained [4] 31:20; 39:19, 23; 69:21		focused [8] 30:3; 61:10; 75:14, 20; 76:12; 77:1; 82:21; 86:17
electronically [1] 177:18	evade [1] 94:2	explicit [2] 111:10; 143:16		
elevators [1] 157:7	evasive [1] 102:22	explicitly [2] 57:8; 101:3		
eliminated [1] 98:1	Evelyn [1] 128:12	expressed [3] 85:15, 18; 130:21		
Elizabeth [1] 177:14	evening [2] 42:7; 149:1			
else's [1] 98:19	event [5] 42:12; 90:7; 91:16, 17; 137:15			
embarrass [2] 103:3; 175:11	events [7] 53:10; 63:2; 70:7; 72:20; 88:25; 131:24; 141:2			
embarrassed [3] 80:10; 99:22; 119:18	eventually [1] 171:22			
Embarrassing [1] 50:15	Everybody [1] 70:18			
embarrassing [9] 37:9,	everybody [6] 13:16; 24:23; 26:16; 76:12; 78:11; 164:14			
	Evidence [1] 6:22			
	evidence [13] 26:12; 28:9; 29:18; 81:10; 82:17;			

focusing [2] 26:4; 59:13	friends [5] 49:16; 62:17; 72:18; 106:21; 156:18	45:1, 2, 4, 25; 46:23; 47:12, 15, 16; 51:22; 52:9; 62:4; 66:24; 72:6; 78:2; 79:6; 80:2, 20; 82:6; 83:10; 107:22; 108:24; 109:22; 111:16, 20; 113:14; 114:25; 116:1; 121:4; 122:8; 146:1; 153:16, 17; 155:15, 18; 156:19, 20; 157:2, 3, 4, 7, 8; 164:21; 166:19; 168:15; 172:20	14, 16, 19, 24; 147:13, 25; 148:1, 3, 6, 13; 151:6; 154:19; 155:5, 22; 156:5; 163:3; 164:19; 165:12; 166:9, 19; 167:24; 168:19; 169:2; 170:6; 176:5, 12, 23; 177:2, 4, 5	hear [17] 4:19, 20; 7:20; 53:22, 25; 55:22; 56:13; 14; 72:2; 101:23; 111:25; 134:13, 22; 135:2, 8; 136:20; 137:10
folks [2] 80:17; 81:17	friendship [1] 10:11	121:4; 122:8; 146:1; 153:16, 17; 155:15, 18; 156:19, 20; 157:2, 3, 4, 7, 8; 164:21; 166:19; 168:15; 172:20	gratification [1] 16:3	heard [15] 24:21; 37:6; 55:21; 68:12; 69:1; 70:16; 72:7; 82:10; 87:18; 122:3; 142:9; 159:2; 169:11
follow [2] 9:8; 59:22	front [2] 58:22; 169:2	156:19, 20; 157:2, 3, 4, 7, 8; 164:21; 166:19; 168:15; 172:20	gratify [15] 15:21; 16:11, 17, 21; 18:3; 95:1, 16; 96:4, 13; 97:1, 21; 98:20; 100:3; 139:4; 151:17	hearing [1] 30:5
follow-up [8] 68:13; 69:5, 14; 79:23, 25; 81:2, 21; 82:4	fruitlessly [1] 140:11	168:15; 172:20	great [7] 22:19; 59:12; 64:25; 84:25; 151:23; 154:4; 175:13	hearings [1] 121:18
follow-ups [3] 70:24, 25; 71:3	frustrated [1] 40:3	given [46] 12:24; 15:5; 22:19; 34:10; 36:7, 11; 14; 43:17, 21; 44:8, 18, 21; 45:11; 46:12, 14, 22; 47:17, 18; 51:25; 52:2, 8, 12, 14; 59:17; 69:13; 70:4; 93:5; 98:16; 99:11; 127:12; 132:6; 139:3; 141:11; 154:25; 155:2, 6; 156:4, 7, 10; 166:16; 167:12; 168:6, 10; 169:1; 175:18; 177:19	greatest [1] 71:12	heart [3] 116:9; 122:23; 124:21
following [5] 105:23; 148:22; 154:1, 5; 168:1	full [6] 3:17; 8:11; 10:12; 14:15; 79:9; 139:1	gives [1] 156:23	grievous [1] 175:23	held [2] 25:19; 30:20
follows [1] 3:12	full-time [1] 32:7	giving [12] 17:24; 33:6; 35:19; 47:7, 19; 52:13, 15; 107:8; 153:17; 169:7, 8	groin [1] 162:15	help [13] 21:7; 26:25; 44:17; 46:7; 47:12; 75:18; 91:8; 94:3; 119:17; 125:2, 7; 144:21; 154:22
footage [2] 158:16, 21	fully [6] 7:9; 20:16; 58:17, 18; 149:24; 170:23	glad [6] 82:24, 25; 122:21, 22, 23; 172:18	grounds [1] 109:17	helped [4] 69:14; 75:21; 77:2; 129:4
force [1] 18:17	function [1] 6:23	Glen [1] 157:4	growing [1] 156:22	helpful [9] 21:1; 29:16, 17; 33:8; 46:3; 79:19; 81:5; 144:22; 147:7
forced [1] 18:20	funded [1] 26:14	goal [2] 27:19; 81:4	guess [5] 30:18; 61:6; 98:6; 138:11; 164:23	helping [5] 81:19; 123:7, 8, 18, 24
forcible [1] 17:13	funding [1] 81:11	God [1] 122:15	guiding [1] 13:11	Here's [1] 66:14
forcing [2] 17:8, 9	funny [3] 48:11; 131:9	goes [3] 14:22; 21:13; 84:8		hereby [1] 177:15
foregoing [2] 177:15, 16	funny's [1] 77:5	going-away [2] 33:25; 36:13		hereto [1] 177:24
forever [1] 148:9	future [2] 114:7; 143:5	gold [1] 52:13		heretofore [1] 98:23
forget [1] 87:24	game [1] 77:6	goodness [1] 49:3		Herrnreich [5] 56:18; 159:3, 11, 22; 174:13
forgot [2] 76:1; 145:19	Gate [2] 83:8; 85:8	gotcha [1] 77:6		hid [1] 115:8
forgotten [3] 65:1; 66:9; 72:19	gate [3] 85:12; 89:15; 90:23	gotten [9] 36:24; 42:5, 14; 73:24; 75:18; 76:6; 82:16; 127:22; 156:17		hide [1] 115:14
form [13] 12:18; 20:19; 25:5; 58:21; 59:3; 60:13; 82:23; 101:5, 21; 102:8; 104:7; 105:9; 175:1	gave [45] 9:19; 23:10; 26:17; 27:12; 29:2; 33:22; 34:1, 21; 35:1, 3, 6, 10, 16; 36:3, 10; 41:24; 44:24; 47:23; 51:17; 52:10; 53:2; 67:19; 77:25; 88:7, 13; 90:22; 114:19; 122:22; 125:23; 127:16; 138:19; 143:16; 154:20, 24; 155:1, 11, 19, 21, 23; 156:2, 9; 166:10; 169:3, 7; 175:16	Governor [1] 162:1		high [1] 38:6
formally [1] 31:15	generous [1] 126:2	government [3] 26:23; 31:19, 21		highly [4] 24:1; 123:17; 142:11; 148:4
formed [2] 124:14, 16	genitalia [8] 96:2, 22, 25; 97:21, 23; 98:19; 100:5; 110:19	Governor [3] 158:5, 8, 17		Hill [2] 121:19; 122:14
former [5] 89:10; 110:11, 17, 21; 111:1	genitals [1] 162:18	governor [1] 158:6		Hilley [3] 111:15, 20; 113:10
forthright [1] 99:12	Gennifer [5] 99:19; 151:19, 21; 152:17; 153:24	grab [1] 162:13		hire [1] 130:13
Fortunately [1] 121:22	gentlemen [2] 3:24; 157:6	Grand [12] 11:6, 7; 13:3, 4; 14:7, 9; 17:20; 21:11, 16, 17; 24:25; 169:16		hired [1] 124:4
fortune [1] 175:11	gets [1] 44:20	grand [81] 3:2, 4, 25; 4:19, 23; 5:10, 14, 16; 6:14; 7:2, 4; 9:16; 10:14; 11:16; 18:11; 20:11; 21:2, 9; 22:21; 69:17; 79:4; 92:13, 16, 20; 93:10, 18, 24; 94:3, 9, 11, 12; 100:18; 102:12; 103:20; 107:17; 110:2; 126:3, 5, 6; 133:3; 142:14, 19; 143:17; 145:19; 146:7,		historic [1] 148:9
forward [1] 62:11	gift [9] 34:11; 44:19; 45:21; 46:10; 47:19, 20; 127:12; 130:15; 156:24			hit [1] 144:11
found [6] 41:17; 84:23; 85:8; 87:1; 89:2; 90:1	gifts [48] 33:22, 24, 25; 34:2, 12, 21, 25; 35:1; 36:7, 10; 43:17, 21; 44:8, 12, 18, 21, 22, 24, 25; 45:1, 16; 46:7, 12, 21; 47:7, 15, 16, 17, 18, 23; 51:17, 19; 52:1, 2, 17, 24, 25; 53:2; 114:19, 21; 116:1; 154:19, 23; 173:11, 22			hold [3] 10:17; 98:14, 15
four [9] 18:10; 70:8, 9; 109:18, 22; 112:8; 164:18, 21; 176:9	girl [1] 124:21			holiday [1] 62:24
four-hour [2] 125:20; 126:8	give [62] 3:25; 6:5; 7:6; 8:11, 16; 22:16; 30:17; 33:19; 35:7, 15, 24; 36:17; 44:13, 22, 25;			home [1] 144:13
four-month [1] 33:2				honest [9] 27:25; 46:5; 67:21; 70:2; 72:6; 83:3; 122:8; 166:2, 12
four-year [2] 72:21; 108:12				honestly [5] 70:13; 73:13; 82:9; 105:18; 149:25
fourth [2] 69:6; 71:25				hope [6] 78:14; 92:1; 107:7; 114:11; 120:19; 136:3
framework [2] 153:22; 166:5				hoped [3] 73:11; 106:15
Frank [1] 73:23				horrible [1] 142:16
frankly [8] 29:3; 32:12; 61:14; 94:18; 106:22; 136:4; 140:8; 164:10				hospital [2] 140:22; 142:17
free [12] 68:13, 22; 70:24; 79:23; 81:22; 82:1; 94:14; 96:18; 102:16; 121:3; 165:22; 166:9				hotel [2] 160:3, 7
freer [1] 48:23				hour [4] 58:5; 63:14; 125:19; 126:10
frequently [2] 84:4, 15				hours [12] 70:8; 109:19, 22; 125:13, 15; 143:25;
Friday [1] 101:2				
friend [7] 47:11; 62:16; 69:12; 70:18; 73:4; 123:7; 164:8				
friendly [1] 163:11				
Friends [1] 44:25				

144:4, 15; 154:5; 164:18, 21; 176:9

House [59] 30:24; 31:9, 13, 14, 23; 32:22, 23; 33:13; 34:12; 39:1; 42:11, 20; 53:16; 54:9; 55:3; 62:23; 63:16; 64:14; 66:22; 68:16; 83:9; 85:23; 89:11; 113:21, 22; 114:3, 5, 10; 124:5; 128:19; 129:16, 23; 130:3, 10; 133:24, 25; 143:7, 21; 149:8; 157:5; 163:21; 164:15; 166:14; 167:6; 170:4, 12, 15, 20, 22; 171:2, 9, 12; 172:10; 173:18; 174:5, 9, 17, 23

House's [2] 166:16, 17

human [1] 122:7

humorous [1] 54:22

hundreds [1] 44:21

hung [2] 44:19; 82:10

hurry [2] 55:24; 57:7

hurt [6] 27:20; 28:6; 78:25; 114:7; 152:19; 153:13

hurts [1] 27:25

husband [2] 162:1; 164:10

hypo [1] 98:16

hypotes [1] 98:17

hypothetical [3] 45:17; 100:15; 139:12

- - -

I'd [22] 9:22; 27:22; 43:21; 48:6; 54:22; 59:9; 65:16; 93:12; 101:18; 116:13; 124:18; 151:18, 21; 153:16, 17, 24; 157:16, 17; 174:1

I've [45] 6:17; 24:21, 22; 26:5; 27:17; 32:24, 25; 45:12; 54:21; 61:9; 63:1, 18; 64:10; 66:9; 67:3; 69:1; 78:5; 81:24; 82:13; 84:24; 85:1; 92:21; 93:20; 97:16; 98:5, 12; 16; 99:11; 110:3; 120:10; 121:13; 137:25; 138:2, 3; 139:21; 153:18; 156:16, 17; 158:22; 159:2; 169:11

lckes [2] 105:24; 108:2

idea [4] 119:12; 143:13, 24; 156:1

identification [5] 11:8; 13:5; 14:10; 21:18; 169:18

identified [1] 41:2

identify [1] 19:18

identifying [1] 154:22

illegal [9] 27:11, 18; 28:25; 78:23; 79:12, 18; 80:23; 81:9

illegally [1] 80:23

imagine [3] 138:8; 156:18; 166:11

immunity [1] 122:22

impart [1] 143:4

implication [4] 72:12; 88:14, 15; 120:9

implies [1] 17:8

important [9] 6:23; 43:20, 25; 70:10; 73:8, 9; 76:11; 77:19; 126:20

impose [1] 136:1

imposed [2] 121:2; 151:5

impossible [1] 139:8

impress [1] 6:25

impression [4] 75:14; 127:16; 158:9, 10

improper [17] 47:10, 19; 20; 51:15; 61:24; 62:1, 6; 98:25; 103:22; 106:17; 18; 123:17; 124:9; 125:6; 131:8; 134:9; 135:23

improperly [1] 131:15

imputable [1] 60:1

inaccurate [1] 25:12

inappropriate [35] 10:5, 7, 9; 11:23; 12:4, 7; 37:10, 21; 38:3, 8; 39:1, 5; 48:2, 9, 21; 49:16; 50:11, 18, 25; 51:4; 54:2; 55:9; 56:6; 61:6; 86:19; 87:16, 21; 88:19; 92:14, 18; 93:3; 136:5; 138:7, 25; 168:9

inappropriately [1] 12:21

incident [6] 83:8; 88:2, 3; 92:3; 118:3; 164:3

incidental [1] 90:14

inclined [1] 63:23

include [13] 10:12; 12:22; 15:23; 16:13; 17:23; 21:12; 24:8, 14, 17; 93:4; 97:20; 98:16

included [6] 10:9; 12:23; 15:25; 17:20; 63:21; 95:2

includes [2] 24:10, 20

inconsistent [1] 113:11

incorrect [2] 98:15; 134:5

incriminate [1] 5:25

incriminating [1] 52:25

INDEPENDENT [1] 3:13

independent [11] 3:10; 21, 23; 4:7; 9:5; 57:10; 140:15; 150:4; 166:3, 14

independent [2] 63:10; 175:12

indicate [1] 30:11

indicated [7] 8:9; 18:7; 22:1, 5; 23:20; 25:2; 126:4

indicates [2] 11:22; 12:2

indicating [1] 39:10

indirect [1] 104:11

individuals [1] 106:2

inevitably [1] 167:8

infer [5] 93:1; 95:6; 96:18; 98:11; 99:8

inferences [1] 167:25

influence [1] 124:3

inform [3] 77:23; 100:17, 18

information [18] 10:15; 27:9; 29:1; 52:22; 53:3; 13; 57:6, 16, 17; 68:21; 69:13; 78:14; 87:7; 88:22; 107:22; 132:7; 163:13; 166:19

informed [6] 40:14; 42:22; 117:2; 146:16; 166:22, 24

initially [2] 88:16; 116:7

inn [1] 160:8

innocent [2] 37:11; 81:7

innuendo [1] 20:15

inquiry [2] 72:22; 175:12

insertion [3] 96:24; 98:19; 100:16

insistence [1] 10:8

insofar [1] 150:22

instance [1] 135:15

institution [1] 166:7

instruct [1] 91:19

instructed [1] 170:23

instructing [1] 149:1

instruction [1] 91:22

instructions [5] 62:11; 87:23; 90:22; 143:4, 16

intact [1] 170:8

intelligent [1] 82:15

intend [2] 7:5; 98:2

intended [2] 23:21; 98:12

intends [1] 8:11

intensely [1] 92:23

intent [17] 15:20; 16:3, 11, 17, 21; 18:2; 47:4; 95:16, 17; 96:3, 13; 98:20; 100:2, 3; 103:3; 139:4; 151:17

intentional [1] 17:12

intentionally [1] 6:13

interchanges [2] 59:21, 23

intercourse [12] 10:3; 12:22; 22:14, 24; 23:16; 24:6, 7, 8, 11, 15, 20; 25:4

interest [3] 52:23; 63:6; 142:25

interested [5] 21:8, 10; 72:11; 150:6; 177:24

intern [1] 32:2

interns [1] 32:1

interpretation [2] 80:21; 90:11

interviewed [1] 113:25

intimate [23] 9:13; 10:5; 11:24; 12:5, 8, 21; 37:21; 38:3, 8; 48:2, 3, 6; 50:16; 53:19; 54:6; 56:6; 135:19; 20; 136:13, 20; 138:25; 139:20; 168:8

intimidated [1] 5:5

intimidation [1] 10:25

intrude [1] 167:8

invade [1] 171:15

invading [1] 171:20

investigating [1] 5:2

investigation [3] 103:19, 20; 165:10

invitation [2] 176:19; 177:3

invite [2] 147:13; 169:5

invited [8] 34:6, 11; 52:18; 69:4; 79:24; 81:1; 161:3; 176:13

inviting [1] 160:2

invocation [3] 6:1; 165:14; 166:18

invoke [3] 5:25; 6:4; 121:13

invoked [1] 165:10

involve [7] 10:5; 11:23; 12:4, 7, 18; 54:16, 18

involved [15] 24:19; 25:17; 29:6; 57:9; 62:5; 64:3; 70:20; 87:24; 122:24; 125:5; 140:14; 15, 19; 143:14; 165:25

involvement [3] 108:3; 132:5; 158:8

involving [3] 17:10; 131:24; 141:2

irate [7] 86:4, 7, 24; 87:6, 8; 88:2; 89:10

issue [14] 17:9; 37:7; 44:1, 19; 46:10; 68:3; 73:8, 9; 98:2; 100:21; 120:11, 25; 121:1; 167:20

issued [1] 101:22

it.I [1] 92:25

items [4] 115:7, 11; 172:25; 173:1

- - J - -

Jackie [1] 142:23

Jane [1] 22:17

January [29] 7:12; 9:9; 10:4, 23; 16:14; 17:19; 32:19; 53:16; 74:7; 100:24; 101:1; 107:14; 108:4; 111:14, 18; 112:12; 118:7; 123:2; 126:12, 19; 127:5, 12, 21; 131:21; 139:17; 141:12, 25; 148:22

JEFFERSON [1] 3:9

John [12] 100:22; 101:6, 14, 25; 104:5; 105:3, 10; 108:1; 111:15, 19; 112:6, 7

Johnson [1] 4:8

Johnson's [3] 4:5, 12; 166:18

joke [1] 36:4

Jones [73] 5:6; 7:13; 8:3, 12; 9:9; 12:24; 14:15; 15:2; 20:8; 26:8; 28:5, 14; 29:4; 33:16; 36:20; 37:12; 15; 44:17; 46:6; 47:8; 51:24; 56:24; 57:9; 58:17; 59:15, 16; 60:6; 66:3, 11, 25; 67:9, 17; 74:13; 76:17; 78:11, 14, 21; 79:10; 81:6, 17; 83:12; 91:8; 93:16; 95:11, 24; 97:2, 11; 115:8; 118:18, 20; 119:13, 23; 120:13; 123:10; 131:22; 136:7; 140:10; 149:17; 150:15, 23; 152:3, 12; 154:10; 163:17, 18; 164:16; 167:8; 169:23; 170:24; 173:8; 174:16; 175:18

Jordan [39] 40:14; 42:7, 11, 19; 43:5, 7; 62:14, 15, 22; 63:13; 64:2, 12; 65:9; 66:21; 68:16; 70:17, 18, 19; 71:9, 11, 21; 72:11, 14; 73:1, 22, 24; 74:14, 21, 22; 75:8; 76:2; 77:21; 105:25; 108:1; 123:1, 7, 15; 125:4; 128:1

Jordan's [1] 42:8

journalist [1] 140:10

Judge [36] 4:4, 8, 12, 15; 13:10, 17; 14:22, 23; 19:4, 12; 21:4; 22:9, 10; 25:1, 4, 22, 24; 26:16; 27:3, 12; 28:13; 58:23; 60:12; 93:5; 103:14; 107:15; 108:3; 121:25; 147:6; 150:24; 152:7, 20; 166:2, 13, 17; 167:3

Judge [10] 15:1; 19:14, 15, 25; 29:24; 98:14; 120:16, 17, 18; 167:13

Judge's [2] 40:1; 151:3

judgment [1] 175:17

judicial [1] 6:23

Julie [1] 164:8

July [1] 163:24	kissed [2] 95:8; 110:15	learn [1] 143:19	150:8; 152:6; 153:16;	27:18; 29:1; 37:11; 42:25;
jumbled [2] 67:20; 76:5	kissing [4] 16:5; 95:20;	learned [4] 85:6; 89:3;	154:10; 12, 20; 155:1, 5,	44:22; 45:14, 15; 47:14,
juror [2] 94:12; 177:5	96:21; 100:4	122:2; 144:3	11; 156:4, 10; 157:13;	17; 48:12, 13; 49:15;
juror's [2] 102:12; 126:3	kitchen [1] 157:5	learning [1] 159:12	168:1, 18; 172:25; 173:1,	50:11; 52:22; 63:3; 67:16;
jurors [26] 5:11; 9:16;	knowing [4] 21:10;	leave [3] 64:18, 19;	22; 174:15	69:2; 73:5; 77:17; 80:8;
20:12; 21:2, 9; 22:22;	29:10; 89:17; 119:1	107:25	Lawinsky's [10] 19:7;	82:17, 25; 108:20; 110:4;
79:4; 92:13, 14, 16;	knowingly [2] 15:12;	leaving [2] 34:11; 65:23	21:15, 20; 23:2; 41:12;	121:14; 127:14, 15;
93:10, 18, 24; 94:11;	16:25	legal [14] 46:6; 79:19;	74:1; 77:8; 84:21; 113:19;	131:11; 132:7; 134:11,
103:20; 128:6; 145:19;	knowledge [13] 53:21;	93:19, 25; 94:2, 3;	138:16	15; 135:3; 158:8, 19;
146:7, 19, 24; 147:13;	90:5, 8; 91:12, 18; 115:5,	103:22, 24; 104:1;	liar [1] 121:25	157:2, 7, 10
165:12; 167:24; 176:12,	6, 9; 145:24; 154:18, 21;	118:13; 151:1; 171:5;	lie [11] 6:13; 80:10;	lots [4] 63:19, 20;
23	155:2	175:10, 17	109:4; 117:7; 119:5, 8;	69:23; 72:23
Jury [12] 11:6, 7; 13:3,	-- L --	legalistic [1] 174:21	120:7, 24; 121:10;	loud [1] 137:11
4; 14:7, 9; 17:20; 21:11,		legendary [1] 138:1	129:10; 164:9	lousy [1] 26:13
16, 17; 24:25; 169:16		Legislative [7] 32:7;	Lieberman [1] 128:12	Love [2] 49:10
jury [50] 3:2, 4, 25; 4:19,	lack [1] 175:10	111:23; 112:24; 113:2;	life [16] 34:1; 47:14;	love [5] 48:14; 49:8, 13,
23; 5:14, 15, 16; 6:14;	ladies [1] 3:24	114:12; 129:4; 130:8	51:3, 9, 11; 71:16; 72:16,	17
7:2, 4; 10:14; 11:16;	Lady [3] 64:18, 19;	legitimate [1] 174:4	21; 73:6; 77:20; 80:9;	loved [1] 48:17
18:11; 69:17; 92:20; 94:3,	65:24	lengthy [2] 109:7, 21	94:18; 122:7; 125:7;	Lt [1] 158:17
9; 100:19; 103:20;	language [4] 45:8;	Let's [2] 58:7; 92:6	131:12	ludicrous [1] 109:3
107:17; 110:2; 133:3;	106:21; 107:4; 131:14	let's [8] 31:2; 37:6;	light [2] 123:22; 169:6	lying [9] 109:11; 110:8,
142:14, 19; 143:17;	large [2] 107:24; 156:17	91:17; 107:25; 109:2;	liked [5] 35:2; 48:12;	16, 20, 25; 111:3, 12;
146:14, 16; 147:25;	larger [1] 120:15	126:10; 132:4; 162:5	127:14; 130:16; 131:11	121:5; 161:7
148:1, 3, 6, 13; 151:6;	last [14] 32:2; 44:24;	letter [1] 114:12	limit [1] 124:13	-- M --
154:19; 155:5, 22; 156:5;	45:14; 70:7; 72:19, 24;	letters [15] 47:25; 49:8,	limited [4] 16:7, 9;	mad [4] 88:17, 20, 21,
163:3; 164:19; 165:12;	73:1, 3, 4; 111:25; 127:2;	12; 50:7; 117:4, 18;	26:22; 69:9	24
16; 166:9; 168:19; 169:2;	158:6; 173:6; 175:6	118:6; 119:10; 163:25;	limits [2] 33:1; 136:1	mail [1] 51:5
170:7; 176:5; 177:2, 4	late [8] 31:1; 84:23;	170:20, 21; 172:5, 8, 22	Linda [9] 29:5; 52:23;	main [3] 75:24; 138:23;
jury's [1] 166:19	85:4; 123:1, 2; 131:4, 17;	letting [1] 81:25	53:4; 68:21; 69:11; 70:4;	167:3
justice [6] 5:5; 6:15;	144:8	level [1] 67:15	71:4; 76:16; 78:20	man [4] 47:19, 20;
10:24; 94:8; 103:5	law [7] 26:12; 28:10;	Lawinsky [168] 5:4; 9:7,	Lindsey [14] 40:17, 24,	74:22; 131:11
-- K --	44:14; 46:1; 79:14; 81:14;	14, 18, 25; 10:9, 21;	25; 41:1; 42:1; 67:11, 25;	managed [1] 176:2
Kathleen [14] 60:6;	172:16	11:23; 12:17; 18:22;	68:11; 70:17; 73:20; 82:9,	mandate [1] 26:22
67:18; 157:17, 18;	lawful [1] 46:5	19:12, 19, 23; 20:5, 16;	166:21; 167:6	manner [6] 20:19; 25:5;
158:20, 25; 160:15;	lawfully [2] 47:3; 79:18	22:2; 23:4; 24:11; 25:3;	Line [1] 74:20	111:10
161:6; 162:11, 24; 164:9;	lawsuit [10] 22:19;	28:2; 30:12, 15; 33:12,	line [18] 14:14; 20:14,	marble [1] 35:7
169:24; 172:23; 174:14	27:20; 39:23; 66:3; 74:15;	15, 18; 36:7; 38:9; 41:19;	22; 55:18; 58:18; 66:14;	mark [1] 14:7
Keep [3] 67:13; 131:7;	77:23; 79:13; 81:10;	42:22; 43:13, 17, 21;	68:3; 74:17, 21; 142:24;	marked [9] 11:6, 8;
133:11	150:14; 175:10	44:7; 45:3, 6; 46:11; 47:6,	157:22; 158:17; 159:10,	13:3, 5, 14:10; 17:19;
keep [14] 23:24; 29:2;	lawsuit's [1] 153:12	11; 48:1, 3; 51:20; 52:3;	15; 173:17, 20	21:15, 18; 169:17
33:5; 43:1; 67:16; 76:15;	lawyer [23] 15:1; 42:16;	53:2, 20; 54:14; 55:9, 15;	lines [4] 8:10; 15:8;	Marsha [1] 113:24
77:4; 109:1; 129:20;	64:9; 65:7; 66:5, 6; 73:23;	58:18; 59:2, 16; 60:21;	17:25; 52:2	Martha's [1] 34:22
130:9; 135:17; 136:16,	74:12; 75:8, 22; 80:24;	61:6, 19, 24; 62:24; 63:8;	lips [2] 151:12; 158:25	massive [1] 40:5
22; 175:16	82:24; 84:10; 119:8;	64:4, 7, 13, 17, 20; 65:17;	list [12] 41:6, 13; 52:19;	masturbates [1] 111:9
KENDALL [48] 4:11, 21;	120:6; 123:8, 9, 18;	66:13, 18, 23; 67:10;	84:20, 22; 116:8, 9, 23;	matter [22] 11:5; 28:4,
11:10, 14, 25; 12:3, 10,	165:18; 170:7, 13;	68:5, 17, 25; 69:12, 25;	117:2, 16; 151:12; 154:24	5; 67:18; 90:13; 92:1;
14; 19:17, 22; 41:11;	171:20; 172:21	70:2, 8, 20; 71:19; 72:7,	157:22; 158:17; 159:10,	103:12; 106:16; 107:10;
58:8, 11; 61:2; 77:10, 12;	lawyer's [1] 59:11	73:24; 74:25; 75:12;	15; 173:17, 20	114:6; 118:20; 149:19,
84:8; 92:7, 10; 97:12, 15;	lawyers [22] 26:8;	76:24; 77:22; 78:10;	lines [1] 39:21	22; 157:21; 159:3;
98:22; 100:6; 104:2;	37:12; 44:17; 59:15, 22,	82:19; 85:7, 11, 22; 86:5;	litany [1] 149:20	160:23; 162:7; 163:15,
105:2; 125:10, 13, 21;	23; 61:14; 66:12; 70:9;	87:7; 88:3, 21; 90:15, 23;	literal [1] 91:9	23; 166:24; 167:12;
126:25; 141:20; 144:18,	76:17; 78:14, 21; 79:10,	92:17; 94:6; 95:24; 96:17;	literally [2] 61:21; 72:23	172:16
20; 145:5, 9, 14; 146:10,	22; 81:6, 18; 150:23;	99:6; 101:5, 11; 104:8;	litigants [4] 152:12;	matters [9] 10:18; 29:4;
14, 18; 148:16; 164:20,	152:4; 153:9; 164:16;	105:23; 106:1, 5, 10;	163:17, 18; 173:8	70:10; 146:8; 166:8;
25; 171:14; 173:23, 25;	170:24; 175:18	109:10; 110:6, 10, 18, 23;	litigated [3] 166:1, 8;	167:7; 168:12; 172:25
174:2, 25; 176:8; 177:6	lead [1] 128:21	111:2, 11, 16, 20, 22;	167:11	May [1] 156:14
Kendall [5] 145:8;	leads [2] 87:5, 22	112:20; 114:17, 22;	litigation [5] 7:13;	mean [29] 7:16; 14:18;
147:6; 154:22; 164:24;	leak [8] 26:17; 27:10;	115:7, 19; 116:5; 118:8;	83:17, 24; 169:23; 174:16	18:17; 24:3; 27:5; 35:18;
171:18	29:19; 30:10; 39:25;	119:4; 120:22; 122:20;	logical [2] 71:3; 85:1	44:23; 45:13; 49:14, 18,
kept [4] 70:8; 124:8;	78:15; 120:15; 152:19	123:8, 16; 124:20; 129:3,	logically [1] 98:11	25; 54:21; 61:18, 22;
137:8; 146:16	leaked [3] 40:4; 99:21;	14; 130:1, 4; 131:2, 4, 25,	logs [1] 42:20	63:11; 67:10; 73:8; 77:12,
killed [1] 142:16	148:10	132:10, 19; 133:7, 13, 23;	long-time [1] 62:15	14; 78:9; 85:21; 90:9;
kinds [2] 15:24; 99:19	leaking [4] 27:18; 28:25;	134:6; 135:12, 20; 136:5;	loss [1] 142:15	
	80:24; 81:9	139:9, 19; 140:5; 141:2;	lost [3] 140:21; 166:8	
	leaks [3] 79:12; 148:5	146:2; 147:9; 149:16;	lot [40] 9:16; 21:7;	

91:6; 92:18, 19; 150:11, 14, 21; 172:17	58:6; 62:9; 67:13; 76:15; 77:4; 89:17; 124:22;	133:13; 134:6; 135:15; 137:5; 139:18; 149:16;	43:5, 6, 15; 44:15; 45:5; 9; 47:4; 49:5, 14, 19;	110:10; 112:20; 114:17;
meaning [6] 23:9, 16;	131:7; 133:11; 136:22;	150:8; 152:5; 153:16;	50:5; 55:5, 6; 56:21;	115:16; 119:4; 122:20;
25:2; 59:5; 121:4, 7	168:23; 169:9; 175:16	154:9, 11, 20; 155:1, 4,	57:24, 25; 58:13, 15, 16;	129:3; 130:1, 4, 11;
means [7] 7:3; 17:1;	mindset [1] 83:3	11; 156:4, 10; 157:13;	59:1, 20, 24; 60:15, 16,	131:2, 3; 132:19; 133:6,
18:5; 59:6, 7; 91:4; 95:7	mine [10] 45:1; 49:16;	168:1, 18; 172:25; 173:1;	17, 24; 61:5, 17, 20; 62:8,	23; 135:12, 20; 136:5;
meant [29] 7:23; 18:3, 4;	63:3, 23; 70:18; 72:18;	174:15	13, 15, 16, 22; 63:13;	138:16; 139:9, 19; 140:5;
22:23, 24; 23:4; 24:2, 23;	81:13; 137:4; 139:2;	Monica's [1] 84:22	64:2, 10, 11, 12; 65:9,	141:2; 142:25; 146:2;
25:4, 12, 16; 52:7; 58:1;	142:19	month [2] 84:3, 15	15; 66:11; 67:1, 8, 24;	147:9; 150:7; 170:21;
62:3; 93:1, 2; 98:3; 99:8;	Minister [2] 144:17;	months [11] 45:15;	68:15, 20; 71:24; 73:19,	171:23; 175:20
108:8, 9; 132:22; 133:6;	63:3, 23; 70:18; 72:18;	62:3; 70:7; 101:18;	21, 24; 74:21; 75:22;	mud [1] 37:12
135:7, 9; 137:12; 141:6;	81:13; 137:4; 139:2;	106:17; 113:20, 21;	77:10; 79:6, 24; 80:18;	myself [8] 10:16; 55:10;
151:16, 17	142:19	118:2; 124:6; 125:6;	81:1, 16, 24; 83:7, 15,	61:14; 92:25; 115:25;
measure [1] 147:12	145:2	162:8	25; 84:21; 85:24; 89:24;	125:3; 148:13; 172:6
media [2] 140:9, 18	183:14, 24; 164:13;	morning [10] 85:7;	91:7; 92:12; 97:8, 12;	mysterious [1] 122:7
meet [14] 34:8, 9; 75:2;	172:1, 23; 175:24	86:12; 132:11; 143:22,	98:22; 99:7; 100:1, 17;	
77:2; 83:23; 84:2, 4, 16,	minutes [9] 39:4; 56:20;	25; 144:4, 7, 15, 24;	102:9, 11; 103:3, 11, 18;	-- N --
18; 101:6; 157:25;	125:14, 15, 19; 138:6;	145:25	104:2, 18; 105:24, 25;	name [14] 3:17, 20;
158:15; 160:2	148:16; 164:22	moorly [1] 157:3	106:19; 109:13; 111:14;	4:16; 9:4; 19:7; 41:12;
meeting [20] 31:15, 18;	misapprehension [1]	mother [4] 114:8;	113:8, 9; 121:8; 122:9;	84:21, 22; 132:12;
34:3, 14; 37:1; 43:13;	47:2	122:21; 140:22; 142:17	123:3; 125:17, 18;	142:23; 158:20, 25;
53:15; 62:15; 75:19;	misimpression [1]	move [5] 13:1; 75:24;	126:25; 128:1; 129:2;	159:12, 17
76:25; 84:5; 85:4; 86:23;	25:24	77:3; 157:16; 162:5	130:18; 138:15, 18;	named [1] 74:22
87:15; 101:1, 15; 116:12,	mislead [5] 6:13; 25:22;	moved [3] 84:17;	139:13; 140:2; 142:23;	Nancy [5] 56:18; 159:3,
15; 131:20; 145:2	70:21; 106:21; 118:19	112:24; 114:9	143:7, 19; 144:21; 145:8,	11, 21; 174:13
meetings [7] 34:7;	misleading [5] 107:11,	movie [2] 49:20, 22	14, 25; 146:10, 25; 147:5;	National [1] 31:24
75:15, 24; 77:3, 84:9	13; 108:11; 109:1; 118:23	moving [3] 33:25;	148:20; 149:12, 23;	natural [1] 82:20
member [2] 87:15;	missed [1] 130:21	75:16; 112:20	150:2, 9; 151:6; 152:24;	nature [7] 9:17; 64:5;
148:3	mistake [5] 17:5; 89:5,	MR [120] 3:2, 6, 14;	154:15, 18, 22; 155:13,	117:23; 135:19; 136:13,
members [2] 72:17;	6; 148:11	4:11, 14, 21, 22; 8:24;	16; 156:14; 157:16;	17; 146:2
167:5	mistaken [1] 161:6	9:1; 11:10, 14, 15, 17, 21,	158:16, 20; 159:19;	Navy [1] 134:13
memories [1] 71:12	Mister [2] 27:4; 103:15	25; 12:3, 6, 10, 13, 14,	161:7, 17; 162:5, 10, 20;	necktie [4] 155:6, 7, 9,
memory [55] 13:19;	mixed [2] 76:6; 145:20	15, 16; 13:6; 14:13;	163:6, 12; 164:17, 20, 24;	10
32:13, 17; 39:6; 42:23;	modified [1] 4:4	19:17, 20, 22, 24; 21:19;	165:9; 166:3, 15, 16, 20,	needs [2] 94:10; 126:21
43:2, 25; 44:9; 45:13, 16,	moment [7] 25:7; 30:5;	41:11, 14; 58:7, 8, 11, 12;	21; 167:6, 23; 169:19, 22;	negative [3] 27:9;
17; 46:19; 55:21; 56:2;	70:11; 83:10; 86:18;	61:2, 4, 16; 77:10, 12, 13;	170:5; 171:1, 5, 18;	111:23; 152:19
63:2, 10, 22, 23; 69:9;	150:5; 173:24	84:8, 19; 92:6, 7, 10, 11;	172:12, 13, 22; 173:21,	Nelvis [4] 156:3, 7;
70:6; 71:12, 15, 16;	Mondale [5] 85:9;	97:12, 15, 18; 98:22;	25; 174:5; 175:4; 176:5,	157:4, 12
72:16, 17; 73:5; 74:5;	86:23; 87:2; 88:4; 89:2	99:2, 3; 100:6, 8; 104:2,	8, 11, 22; 177:6, 10	net [1] 153:1
78:1, 4; 83:5; 84:1; 91:2,	money [6] 40:5; 99:21;	4; 105:2, 4, 6, 8; 125:9,	Mrs [24] 53:18; 55:2;	Netanyahu [2] 144:17;
20; 105:21; 113:12, 13;	151:22; 164:11; 172:4;	10, 13, 15, 16, 21, 22;	86:4, 7; 87:22; 107:25;	145:2
114:15; 115:3; 116:24;	175:13	126:1, 25; 127:10;	131:20; 133:5, 19;	neutral [1] 113:4
118:14; 121:17; 127:1,	Monica [121] 5:4; 9:7,	141:20, 22; 142:4, 22;	134:21; 135:18; 136:12,	news [3] 40:4, 6; 76:16
24; 129:9, 19; 132:14,	14; 41:10, 12, 19, 21;	144:18, 20, 23; 145:5, 7,	17, 20; 137:15, 21;	Newsweek [3] 140:7, 8;
25; 134:24; 135:1; 137:4,	42:5, 8, 14; 46:14; 49:11;	9, 11, 14, 18, 22; 146:10,	139:16, 25; 140:25;	164:7
21; 142:19; 158:10;	52:3; 53:2, 24; 54:1;	13, 14, 16, 18, 21, 22, 23;	141:17, 23; 142:6; 162:6	nice [5] 35:14; 36:14,
161:16; 170:17	56:12, 17, 18; 62:24;	147:2; 148:15, 16, 19;	MS [2] 14:7; 169:15	16; 44:23; 103:18
men [3] 112:16; 157:3;	63:8, 14; 64:4, 7; 65:5;	164:20, 23, 25; 165:3, 8;	Ms [113] 8:11; 9:18, 25;	nicely [1] 126:3
159:18	66:13, 18, 23; 67:10;	167:21, 22; 169:13, 19,	10:9, 21; 11:23; 12:17;	Night [1] 144:15
mention [1] 129:25	68:5, 25; 69:12, 24; 70:2,	21; 171:14; 172:7;	15:2; 18:22; 19:6, 12, 19,	night [24] 32:3; 55:12;
mentioned [11] 16:15;	19; 71:19; 74:25; 75:12;	173:23, 25; 174:2, 12, 25;	23; 20:5, 8, 16; 21:15, 20;	62:23; 63:9, 15; 64:3, 21;
36:19, 25; 37:1, 4; 66:7;	76:4, 24; 77:1, 22; 84:21;	176:4, 8, 18; 177:3, 6, 10	22:2; 23:2, 4; 24:11; 25:3;	66:22; 69:11; 71:4; 73:23;
93:20; 98:9; 108:18;	85:7, 11, 22; 86:9, 22,	Mr [238] 3:2, 6, 15; 4:11,	28:2; 30:12, 15; 33:12,	117:20; 138:1, 20; 144:8,
129:18; 163:12	24; 89:2; 90:15, 23;	23; 6:8, 21; 8:4, 9, 25;	15, 18; 36:7; 38:9; 42:22;	14, 17, 24; 145:13; 149:2;
merit [5] 22:11; 120:18;	95:24; 96:17; 99:6; 101:5,	9:2, 3, 6, 13, 15, 24; 11:1,	43:13, 17, 20; 44:7; 45:3,	159:25; 160:3, 13; 161:3
150:25; 151:1; 175:10	111; 105:23; 106:1, 4, 10;	2, 18, 19, 22, 25; 12:10,	6; 46:11; 47:6, 11; 48:1,	nine [3] 31:6, 8; 32:22
messages [3] 49:1;	109:10; 110:6, 18, 23;	17, 19; 13:7, 13; 14:12,	2; 51:18, 20, 22; 53:20;	nineteen [1] 83:12
170:21; 172:5	111:2, 10, 16, 20, 22;	14; 15:10; 17:18; 18:6;	54:13, 24; 55:9, 15; 57:2,	nobody [1] 38:21
Middle [1] 145:3	113:18; 114:21, 25;	19:11, 17, 18, 25; 20:4,	8, 21; 58:18; 59:1; 60:21;	noddled [1] 39:10
middle [2] 47:7; 116:18	115:7, 19; 116:5, 13, 18;	21, 25; 21:14, 15, 24;	61:6, 19, 24; 64:13, 17,	non [2] 78:18; 118:13
midnight [1] 144:17	118:8; 120:22; 123:7, 16;	24:24; 25:7, 12, 23; 26:1;	20; 65:17; 68:17; 70:7;	non-documents [1]
midway [1] 20:22	124:20; 126:14, 15, 20,	27:5, 6; 28:20; 29:14, 21;	73:24; 74:1; 77:7; 78:10;	173:22
mind [25] 7:1; 21:3, 4,	22; 127:25; 128:4, 6, 16;	30:3, 11; 33:10, 23; 34:5;	80:3; 82:19; 86:5, 23;	nonetheless [1] 55:12
10; 23:2, 18, 19, 24;	129:14; 130:15, 17;	36:8; 40:10, 14, 24, 25;	87:7; 88:3, 21; 92:17;	nonresponsive [1]
24:13; 28:19; 29:2; 48:25;	131:25; 132:9, 23;	41:1; 42:6, 8, 11, 19;	94:8; 104:8; 105:25;	41:24

From meaning to nonresponsive

normal [2] 103:19; 106:7	32:6; 36:7; 79:24; 133:13; 135:22	133:25	Paula [22] 7:13; 8:3; 9:8; 28:5; 33:16; 36:20; 37:15; 47:8; 51:24; 58:17; 60:6; 67:9; 17; 78:11; 83:12; 119:13; 131:22; 140:9; 149:17; 150:15; 23; 154:10	97:21, 22; 98:21; 99:19; 100:4; 102:13; 124:20; 24; 125:5; 129:15; 151:10, 13; 168:4, 5; 172:18
Normally [1] 5:14	occupies [1] 56:19	ordered [1] 152:20	Pause [1] 97:9	person's [2] 16:20; 18:2
normally [8] 70:15; 84:15; 131:14; 146:17; 149:5; 156:23	occur [1] 39:6	orders [5] 26:17; 27:12; 40:1; 88:7, 13	pay [2] 25:17; 62:9	person-to-person [1] 161:13
Northwest [2] 83:8; 85:8	occurred [11] 37:3; 43:22, 23, 24; 49:22; 55:9; 82:23; 118:3; 136:23, 24	ordinary [3] 22:16, 21; 121:7	paying [4] 26:2; 59:12; 60:2; 61:8	personal [13] 44:24; 51:11; 163:20; 170:11, 12, 14, 19; 171:8; 173:11, 17; 174:8, 22
nose [1] 40:1	occurring [3] 70:11; 73:10; 134:9	organization [1] 143:8	peace [1] 145:3	personally [3] 82:18; 165:13; 173:15
NOTARY [1] 177:13	occurs [1] 111:8	originally [1] 157:12	pending [1] 83:13	personnel [2] 89:4; 161:13
note [5] 15:5; 130:17, 18, 20, 24	October [2] 157:22; 158:3	ought [2] 36:17; 169:5	Pentagon [7] 114:7; 128:4, 6, 11, 18; 129:17; 130:6	persons [3] 3:4; 4:19; 79:21
notes [4] 47:25; 48:1, 4, 6	off-color [1] 48:11	outcome [1] 177:25	people [62] 4:18; 22:14, 18, 21, 22; 24:3, 9, 10, 17; 31:23; 37:11; 38:20; 39:21; 44:22, 24, 25; 46:4; 47:17; 49:3; 52:21; 72:2; 78:19, 24; 79:11; 80:23; 81:8; 82:15; 87:8; 88:22; 89:14, 19; 91:15; 101:7, 10, 23; 105:23; 106:3, 7; 107:20, 24, 25; 108:19; 118:19, 20; 120:13; 122:12; 129:4; 131:13; 134:13; 138:3; 152:2; 156:20; 157:4, 6, 14; 162:25; 163:1, 13; 165:25; 166:9; 175:16; 176:2	persons [3] 3:4; 4:19; 79:21
notified [2] 74:7; 176:5	Office [37] 3:21, 22; 4:7; 9:5; 31:10; 32:3, 7; 54:9; 57:10; 58:2; 86:5; 88:4; 91:24; 109:11; 110:7, 19, 24; 111:24; 112:24; 113:2, 23; 114:12; 117:9; 132:22; 133:7; 135:3, 4; 137:8, 16, 23, 25; 138:14; 140:15; 142:1; 166:3, 13; 173:19	outside [3] 93:11; 166:16; 170:25	perception [2] 57:5; 142:11	Phone [1] 111:8
notify [1] 74:4	offices [1] 32:1	Over [25] 31:9; 54:9; 58:2; 86:5; 88:4; 91:24; 109:11; 110:7, 19, 24; 117:9; 132:22; 133:7; 135:2, 4; 137:8, 16, 23, 25; 138:14; 142:1; 162:7; 173:13, 16, 19	perfect [1] 70:6	phone [16] 42:20, 25; 63:14; 75:19; 78:5; 85:21; 86:1; 111:2, 7, 8, 11; 116:4, 15; 127:25; 170:21; 172:5
notifying [1] 41:2	office [13] 8:25; 10:17; 42:8; 56:12, 18; 91:25; 132:21; 135:3, 5; 145:25; 148:14; 162:7; 173:13	overheard [2] 86:5, 22	perfectly [2] 57:13; 79:23	physically [5] 9:13; 135:20; 136:13, 19; 139:20
notwithstanding [1] 150:18	officer [1] 177:14	overreaction [1] 89:9	perform [2] 150:16; 168:1	pick [1] 51:19
November [2] 31:19; 162:6	Officers [1] 87:24	owe [1] 125:24	performed [7] 93:14; 100:12; 102:13; 104:25; 151:7, 11; 152:5	picked [2] 115:6, 7
Number [1] 86:21	offices [1] 90:6		performer [1] 150:22	picking [1] 114:21
number [22] 15:6; 69:22; 84:9; 98:10; 100:14; 101:7, 22; 102:18; 106:3; 127:6; 132:16; 148:5; 156:17, 22; 159:4, 11, 22, 25; 160:16; 173:3; 175:14	official [1] 174:9		period [9] 30:24, 25; 32:18; 33:3; 69:24; 84:6, 13; 126:8; 138:9	piece [1] 163:14
numbers [1] 169:14	officials [1] 165:10		periods [1] 30:23	pin [4] 35:23; 36:3; 45:10; 52:12
numerous [1] 48:3	Oh [9] 39:15; 41:9; 50:2; 56:7; 104:14; 128:23; 131:3; 156:8, 12		perjurious [1] 71:23	pizza [1] 32:4
	oh [2] 49:3; 84:2		perjury [13] 6:14; 10:24; 79:7; 94:8; 103:6, 13, 17; 104:12, 17, 24; 108:22; 109:4; 148:8	place [4] 21:5; 34:25; 151:1; 162:15
	OIC [1] 5:10		permanently [1] 54:15	placed [1] 162:18
	Okay [11] 105:19; 110:18; 112:3, 14; 119:15; 125:10; 126:12; 136:16; 144:16; 145:11; 167:2		permission [1] 9:22	places [2] 53:25; 96:12
	Old [1] 113:23		permitted [3] 4:19; 22:10; 28:14	placing [1] 44:4
	old [2] 36:15; 40:4		person [60] 4:16; 15:11, 12, 19; 16:1, 19, 24; 18:1; 28:4; 40:16, 19; 42:2, 5; 43:4, 12, 24; 45:24; 60:7; 62:2, 19; 67:7, 9, 11, 23, 25; 68:3, 9; 70:22; 73:19; 87:9; 94:19, 20, 23; 95:1, 8, 9, 20, 21; 96:2, 3, 25;	plain [1] 51:7
	ones [1] 175:19			plaintiff [2] 8:14, 19
	onslaught [1] 140:18			plaintiffs [1] 26:18
	open [4] 134:12; 135:4; 137:8, 9			planning [1] 145:3
	opening [2] 138:24			Please [2] 9:24; 44:5
	operated [1] 170:11			please [11] 3:7, 17; 7:2; 11:5, 11; 13:22; 14:16; 104:3; 145:6; 168:15; 174:4
	operation [2] 108:20; 162:22			pleased [1] 55:8
	opinion [2] 124:14, 16			Plus [1] 125:21
	opponents [1] 26:15			Podesta [11] 100:23; 101:6, 14, 25; 104:5; 105:3, 10, 24; 108:2; 112:7
	opportunity [1] 67:15			point [19] 9:21; 18:18; 52:20; 61:23; 73:9; 75:17; 86:21, 25; 99:16; 111:21; 112:1, 4; 118:13; 131:14; 133:23; 139:12; 155:12; 161:12, 13
	Oral [1] 100:11			
	oral [15] 93:14; 101:5; 21; 102:10, 12; 104:8, 25; 105:9; 121:10; 123:6; 150:16; 151:7, 11; 152:5; 168:1			
	order [8] 4:5, 12, 13, 15; 97:21; 124:4; 130:12;			

From normal to point

pointed [4] 20:11; 52:4; 126:3; 154:15 points [1] 108:23 political [8] 26:14; 27:23; 39:23; 78:13; 79:5; 81:11; 143:8; 176:19 politically [3] 28:6; 79:1; 153:5 politically-oriented [1] 78:18 politician [1] 71:13 portion [4] 6:22; 15:9; 20:13; 75:1 portions [1] 18:23 posed [2] 165:11, 13 posing [1] 20:9 position [5] 112:9, 15; 147:25; 152:24, 25 possession [5] 20:17; 35:13; 58:19; 173:4, 11 possessions [1] 163:20 possibilities [1] 128:7 possibility [4] 37:2; 41:22; 119:5, 7 Post [5] 100:25; 101:3; 107:14; 108:18; 141:12 powerful [1] 123:7 preceding [1] 149:25 precisely [1] 87:6 precision [1] 84:25 preparation [3] 29:6; 61:11; 69:9 prepare [3] 29:13; 67:15; 76:20 prepared [14] 3:4, 25; 29:2, 3, 4; 59:19; 60:3, 5; 76:18; 94:9; 152:3, 4; 160:10, 11 preparing [2] 74:2; 153:9 present [13] 5:18; 20:23; 22:8; 25:11; 36:13; 60:22; 61:25; 62:2, 7; 63:24; 159:4 presents [2] 35:4, 5 preserve [2] 10:17; 147:12 preside [2] 19:15; 20:1 Presidency [1] 166:6 President [126] 3:5, 15; 4:23; 6:8, 21; 8:11, 25; 9:2, 6, 13, 24; 11:2, 18; 22; 12:17; 13:7, 13; 14:14; 15:10; 17:18; 18:6; 19:25; 20:11, 19, 21; 21:16; 24:24; 28:21; 29:21; 30:11; 33:10, 23; 36:8; 40:10; 43:15; 44:20; 45:9; 47:4; 49:5, 19; 50:5; 55:5; 57:24; 58:13, 21; 59:3; 60:11, 15; 61:18; 62:16; 64:12; 65:15; 66:11; 68:15; 73:22; 77:10; 79:6; 80:18; 81:16; 25; 83:7; 84:21; 87:15; 89:11; 24; 91:7; 92:12; 97:8, 13; 100:1, 17; 103:3, 18; 104:18; 106:19; 109:13; 111:15; 121:8, 10; 122:9; 123:3; 125:17; 126:25; 129:2; 130:18; 138:15; 139:14; 141:23, 25; 142:2, 23; 143:19; 145:14, 25; 148:20; 149:23; 150:9; 151:7; 154:18; 155:14; 156:17; 157:16; 158:16; 159:19; 161:7, 18; 162:5; 10; 163:7, 12; 164:17; 165:9; 166:15; 167:7, 9; 23; 169:22; 170:15; 171:1, 8; 172:12, 22; 174:8; 175:9; 176:5; 177:10 President's [5] 72:21; 89:16, 22; 90:19; 145:24 Presidential [2] 130:3; 173:14 Presidents [3] 36:15; 127:13; 130:16 presiding [2] 19:13; 29:24 press [7] 56:25; 132:13; 143:9, 13; 149:19, 23; 152:20 pressed [1] 146:5 pressure [2] 72:20, 21 presumably [1] 71:23 presume [1] 52:23 pretend [4] 88:8; 90:22; 24; 91:17 pretty [3] 82:13; 91:9; 162:24 prevent [2] 113:6; 114:13 previous [6] 17:4, 6; 72:5; 90:11; 109:17; 175:9 Prime [2] 144:17; 145:1 principal [3] 89:16; 166:13; 167:12 privacy [4] 10:15; 102:23; 147:12 private [8] 61:3; 94:18; 112:21; 113:6; 114:11, 13; 131:12; 167:8 privilege [14] 5:23, 25; 165:10, 14, 19, 20; 166:18; 167:11, 20; 170:7; 171:16, 20; 172:21 privileged [1] 171:17 privileges [3] 93:21; 166:1 problem [5] 46:25; 47:1; 70:20; 123:11, 12 Procedure [1] 4:4 proceed [1] 3:7 proceeded [1] 26:23 proceeding [1] 4:3 proceedings [10] 11:12; 58:9; 92:8; 125:11; 146:17; 148:6, 17; 165:6; 177:11, 15 process [1] 145:4 produce [7] 46:14, 22; 155:19; 163:16, 22; 171:9, 12 produced [3] 45:11; 155:22; 173:2 production [4] 43:16; 44:11; 163:19; 170:10 profess [1] 49:7 professed [2] 48:14; 49:12 prohibited [1] 31:22 promise [1] 130:1 promised [1] 55:10 prompting [1] 52:5 promptly [1] 138:19 proper [3] 89:23; 122:16; 166:4 prosecuted [1] 6:14 prosecutor [2] 121:23; 122:13 prosecutors [1] 103:21 prospect [2] 33:19; 176:23 prospects [1] 114:7 protect [2] 102:23; 148:13 prove [3] 40:2; 121:25; 154:2 proved [1] 124:3 provide [3] 10:14; 14:5; 155:13 provided [4] 9:8; 13:2; 8, 21 proving [1] 26:9 psyche [1] 125:2 PUBLIC [1] 177:13 public [6] 100:24; 106:16; 115:12; 136:3, 6; 171:23 pulled [1] 150:23 pummel [1] 27:21 Purdy [2] 91:23, 25 purports [1] 121:15 purpose [7] 6:24; 16:3; 30:8; 95:1; 103:8; 139:24, 25 purposes [5] 15:10; 16:23; 78:13; 111:7; 120:15 putting [3] 81:12; 130:24; 144:21	60:22; 64:15; 67:5, 6, 23; 68:2, 3, 7, 8, 13; 69:18; 70:22, 23; 71:1, 18; 72:4; 5, 6, 12; 75:10, 11; 76:2; 78:1; 79:16; 81:1, 19; 82:8; 84:1, 8; 85:1; 86:18; 87:5, 22; 88:15; 90:11, 20, 21, 25; 91:11; 92:16; 93:13, 14; 97:5; 10; 98:6, 23, 24; 99:9; 102:12; 103:25; 104:3, 5; 21, 22, 23; 109:18; 110:6; 111:8, 10; 114:19; 118:9; 122:25; 127:1; 128:5, 15; 136:10, 12; 138:21; 144:20; 145:7; 19; 146:11, 13, 25; 147:7; 149:24; 152:4, 25; 153:7; 155:17; 159:1; 160:21; 165:1, 13; 168:19; 170:5; 171:15; 174:3, 4, 6, 20; 175:1 question's [1] 168:3 questioning [2] 8:24; 79:11 questions [94] 5:9; 7:18, 21; 8:23; 9:10, 21; 10:20, 21, 23; 15:6; 17:10; 18:22; 19:7, 10, 12; 20:5, 7, 9; 21:9; 26:5; 7; 28:14, 20; 29:11; 52:24; 55:16; 56:23; 57:3; 61:2, 15; 62:13; 67:2, 13; 68:23; 69:4, 5, 8, 14, 22; 72:1, 2; 73:5; 76:10, 19; 77:17; 79:24, 25; 80:14; 81:2; 92:12, 22; 93:20; 23, 24; 94:1, 9; 100:19; 102:18; 103:5, 7, 21, 24; 104:11; 109:5; 110:5; 116:12; 126:6, 9; 128:17; 21; 132:9, 16, 24; 139:22; 143:9; 147:15; 148:8; 149:12, 21; 150:20; 151:4; 154:11; 157:17; 162:21; 164:19; 165:11; 166:15; 167:23; 169:20; 175:14; 176:6, 7, 15 quick [1] 145:18 quickly [2] 57:16; 132:25 quorum [1] 3:3 quote [1] 19:20 quoted [2] 65:12; 67:23 quoting [1] 8:10	164:7; 170:10 rapid-fire [1] 67:14 rate [1] 173:10 rational [1] 121:20 react [2] 141:5; 164:12 reaction [1] 85:10 read [26] 6:21; 7:24; 9:16, 22; 13:23; 14:15; 17; 18:18, 23; 19:2; 20:13; 23:23; 29:9; 49:2; 50:12, 21; 61:11; 67:21; 68:2; 71:10; 95:14; 98:6; 99:23; 121:14; 151:15; 158:24 reading [5] 18:4; 21:11; 30:4; 100:14; 152:2 real [3] 27:19; 28:3; 31:18 realize [2] 70:23; 169:12 realized [2] 57:9; 149:15 reason [17] 28:3; 42:18; 44:6; 51:12; 62:25; 63:16; 64:20; 74:10; 103:16, 17; 106:11, 12; 127:19; 153:23; 160:15; 165:25; 177:6 reasonable [7] 56:22; 70:3; 72:8; 73:14; 78:17; 121:4; 168:5 reasons [3] 27:13; 129:18; 135:13 recall [44] 52:3, 7, 8; 65:21, 25; 66:4, 6; 71:7; 82:2, 3; 83:24; 85:25; 86:3; 88:7, 12, 13; 90:16; 101:1, 9; 105:22, 25; 106:3; 112:18, 19; 116:6; 118:10; 119:25; 129:9; 25; 133:2, 21; 135:24; 143:5; 148:23, 25; 159:21, 24; 160:2, 5, 25; 162:8; 169:25 recalled [2] 73:21 receive [2] 3:5, 25 received [5] 21:9; 33:16; 40:11; 130:15; 159:24 receiving [2] 5:9; 63:14 recessed [6] 11:12; 58:9; 82:8; 125:11; 148:17; 165:6 recipient [1] 150:22 recollection [27] 14:20; 32:8; 34:8; 36:23; 44:7; 51:2; 56:11, 20; 92:5; 110:9; 112:20; 113:16; 17; 120:4; 127:22; 129:6; 11; 131:5, 24; 132:3; 141:1, 9; 143:2; 161:2, 9, 21 recommendation [11] 46:13; 111:16, 20, 23; 112:22; 113:1, 4, 5, 11; 114:6; 129:24
-- Q -- Question [2] 66:16; 74:20 question [111] 5:24; 7:7, 9; 8:13, 18; 14:2; 20:15, 16; 21:13; 23:17; 40:20; 41:16; 43:20; 44:9; 45:16; 49:5, 7; 58:1; radio [6] 54:9; 55:5, 7; 137:18; 138:4, 10 raised [6] 37:7; 119:5; 165:18, 20; 175:14; 176:24 rally [1] 160:14 ran [4] 163:19, 23;	-- R -- rally [1] 160:14 ran [4] 163:19, 23;	

-- Q --

-- R --

From pointed to recommendation

recommended [2] 42:15; 66:5	128:22; 131:10; 135:17; 20; 136:2, 14, 17; 143:21; 146:2, 4	reminiscent [1] 65:18	revealed [2] 87:7; 101:8	save [1] 9:15
reconcile [1] 137:13	relationships [2] 24:18; 123:16	remotely [2] 60:9; 115:9	revealing [2] 50:15; 89:10	saying [37] 20:18; 25:8; 25; 46:9; 51:6; 58:20; 61:9; 25; 64:24; 65:2, 4; 25; 66:4; 76:1; 81:16; 82:6, 12; 89:18; 91:10; 115:18; 118:10, 11; 119:20; 121:9; 129:2, 7; 12; 131:5; 142:24; 158:25; 164:8; 171:11; 175:24
record [13] 3:18; 11:20; 14:20; 25:23; 39:12; 63:11; 109:9; 129:22; 130:5; 169:13; 176:25; 177:3, 19	relative [1] 177:22	repeat [1] 119:23	reveals [1] 50:8	schedule [4] 63:25; 89:16, 19; 90:19
records [16] 30:21; 31:2, 3, 4, 12, 13; 33:5, 9; 43:1, 2, 11; 63:5; 64:1; 138:12; 160:16	relax [2] 133:2; 140:23	repeated [1] 28:25	revert [3] 110:17, 22; 111:1	scheduled [1] 31:15
reduced [1] 177:18	relayed [1] 126:20	repeatedly [3] 27:11; 61:10; 163:5	reverting [1] 110:20	schedules [1] 138:3
refer [6] 13:24; 74:17; 101:16; 131:18; 168:7; 170:21	release [3] 164:7, 14, 15	rephrase [1] 99:2	reviewed [2] 17:12; 33:9	Scott [2] 113:24; 130:11
reference [5] 17:16; 18:12; 113:10; 137:7; 151:5	released [2] 162:23; 163:13	Report [4] 143:20; 144:3, 11; 154:8	Richmond [11] 157:22; 158:2, 11, 14; 160:5, 9, 12, 13; 162:3, 25; 163:14	search [6] 154:24, 25; 170:4, 18; 174:14, 19
referenced [1] 9:9	relevant [1] 9:21	reported [4] 74:20, 24; 75:12; 77:22	ridiculous [1] 99:20	scheduled [2] 43:25; 121:17
referred [4] 4:12; 64:9; 65:7; 92:17	relied [1] 174:21	REPORTER [1] 177:13	Right [1] 146:18	second [2] 55:6; 87:5
referring [10] 17:12; 19:21; 20:13; 21:14; 25:3; 41:1; 74:21; 133:17; 135:10; 137:2	relieve [1] 73:14	reporters [1] 120:2	right [56] 14:19; 30:13; 33:2; 34:19, 23; 35:17; 36:8, 11; 40:14; 43:5; 47:16, 24; 48:4, 7; 50:16; 51:13; 53:23; 54:20; 56:11, 19; 57:18, 22; 58:1; 63:7; 68:11; 79:6; 80:21; 83:22; 97:16; 98:9; 107:18; 114:16; 125:22; 127:17, 22; 130:14; 131:19, 25; 132:3, 15; 133:6, 9; 137:17; 139:20; 144:5, 19; 148:7, 25; 155:20; 157:17; 158:6; 159:24; 160:10, 14; 166:19	Secondly [1] 124:7
reflect [2] 42:21; 141:9	remained [1] 13:10	reporting [1] 143:20	rights [2] 5:13; 6:18	seconds [9] 109:23, 25; 110:1; 125:21, 22, 23, 24; 174:2; 175:2
reflects [1] 73:18	remaining [1] 167:23	reports [1] 76:16	risk [2] 125:3; 166:6	Secret [11] 86:22; 87:6; 12, 23; 89:14, 21; 90:5; 91:15, 19, 21; 165:19
refresh [7] 131:24; 132:3, 14, 25; 141:1; 143:1; 161:2	remarks [1] 32:4	representation [2] 141:20, 22	road [1] 129:21	secret [2] 106:14; 135:17
regard [4] 67:17; 91:20; 92:5; 167:25	remember [192] 13:9; 13, 14; 15:7; 17:4, 6; 19:6, 8; 21:20, 22, 24; 30:19; 31:17, 18; 32:5, 8; 9, 15, 16; 33:4, 6, 7, 15; 18, 20; 34:5, 14; 35:5, 6; 9, 18, 19, 20, 22; 36:2, 5; 6; 37:1; 38:23; 40:19, 20; 44:2; 45:8, 12, 13; 46:8; 20; 49:19, 23, 25; 50:3, 5; 10, 13, 14, 19; 52:13, 14; 15; 57:19; 64:5, 6, 8, 24; 65:2, 4, 5, 11, 13, 15, 18; 23; 66:7, 8, 10; 67:7, 12; 23; 68:18; 69:23; 70:13; 72:24; 73:18; 76:14, 22; 23, 25; 77:16; 82:10, 22; 83:1; 84:24; 85:1, 24, 25; 86:8, 11, 18; 87:4, 11, 20; 88:18, 20, 25; 89:1; 90:13; 92:4; 101:15, 17; 18, 20, 22, 24; 105:14; 17, 18, 21; 108:17; 116:12, 14, 16, 17; 117:6; 14, 19, 22; 118:11, 15; 126:14, 17; 127:2, 8, 18; 128:8, 16, 20, 23, 24, 25; 129:1, 17; 130:18, 20; 131:4, 17; 132:4, 18; 135:12, 13, 15; 138:7; 140:3, 4, 5; 141:3, 8, 15; 142:7, 8, 9, 11, 13, 21; 144:9; 154:14, 16; 155:19, 21, 23; 159:17; 161:11, 20, 25; 162:2, 3; 164:1; 169:7, 10; 171:7; 173:5, 6	request [8] 44:11; 46:22; 98:17; 163:18; 170:3, 9, 24, 25	Robert [2] 8:4; 9:4	section [2] 97:25; 130:9
regarding [2] 6:18; 93:13	requested [3] 34:3, 7, 14	requests [3] 163:17; 169:23; 170:10	Rockettes [2] 35:10, 11	sector [4] 112:21; 113:7; 114:11, 13
regret [1] 10:11	required [7] 103:1, 7; 152:7, 11; 163:15, 22; 164:15	requiring [1] 94:16	romantic [2] 49:21; 130:24	Security [1] 31:24
regrettably [1] 39:3	Residence [3] 42:13; 162:23; 64:2	reread [1] 18:10	room [10] 3:4; 4:18; 5:16; 56:17; 132:20, 21; 135:14; 160:17; 161:3, 21	sees [1] 126:2
reiterate [1] 46:17	resolved [1] 137:1	residence [3] 42:13; 162:23; 64:2	rope [4] 157:21; 158:17; 159:10, 15	self-evident [1] 151:13
related [7] 5:6; 9:18; 18:22; 60:7; 64:16; 146:23; 177:20	respect [8] 27:4; 29:3; 40:23; 103:11; 104:10; 18; 177:1, 2	respect [8] 27:4; 29:3; 40:23; 103:11; 104:10; 18; 177:1, 2	Ruff [2] 83:25; 166:3	self-incrimination [2] 5:23; 93:21
relating [1] 154:11	respectfully [1] 94:11	respond [1] 39:12	Rule [2] 4:3; 6:22	sell [1] 172:3
relation [1] 167:25	response [7] 39:11; 102:11; 109:7; 154:19; 158:25; 163:16; 165:11	responsibilities [3] 5:14; 6:18; 136:9	rule [3] 45:25; 98:18; 167:13	semen [2] 138:15; 139:8
Relations [1] 97:11	responsibility [7] 10:12; 28:18, 24, 25; 92:25; 107:12; 139:1	responsible [2] 25:19; 55:12	ruled [9] 13:10; 22:9; 10; 28:13; 120:16, 17, 18; 150:24, 25	send [5] 48:3, 12; 156:20; 159:10; 169:4
relations [29] 10:3, 22; 14:18; 15:11; 16:24; 23:25; 60:21; 93:5; 94:22; 95:10, 24; 96:8, 19; 97:2; 99:5, 18; 103:14; 105:1; 106:9; 110:10, 14; 139:3; 147:9; 150:10, 20; 151:9; 19; 152:13; 168:6	rest [7] 13:18; 39:2; 51:9, 11; 60:9; 64:8; 139:6	rest [7] 13:18; 39:2; 51:9, 11; 60:9; 64:8; 139:6	rules [1] 4:4	sending [3] 168:20, 25; 169:4
relationship [65] 9:7; 18; 10:20; 21:21; 22:14; 18, 23; 23:15, 21; 24:2, 5; 10, 14, 19; 37:10, 21; 38:3, 8, 16; 47:6, 10, 21; 48:1, 2, 15, 22; 49:9; 50:8, 16, 18, 24; 51:7; 56:8; 59:1; 61:6; 62:1; 64:4, 7, 15; 66:2; 68:25; 74:9; 82:19; 105:22; 106:1, 10, 15; 107:4; 108:4; 117:23; 118:1; 120:23; 121:2, 9; 123:19;	remembered [9] 42:11; 50:3; 52:10; 56:2, 5, 6; 57:7; 67:17; 154:25	restaurant [1] 34:22	rulings [2] 151:3; 163:16	sends [1] 50:7
remind [1] 151:15	remembering [1] 17:5	restriction [1] 133:18	run [1] 157:7	sense [4] 17:2; 80:25; 95:5; 121:7
reminded [2] 18:24; 49:22	reminds [1] 121:18	restroom [1] 58:6	sat [2] 59:21; 174:21	sentence [1] 124:16
reminds [1] 121:18	reminiscent [1] 49:21	result [1] 78:19	satellite [1] 176:20	sequence [3] 59:14; 82:23; 88:25
reminiscent [1] 49:21	resemble [1] 104:2	resume [1] 113:15	satisfaction [1] 109:24	sequencing [1] 148:21
	restaurant [1] 34:22	reveal [2] 74:18; 128:21	satisfactory [1] 170:6	series [2] 92:12; 132:24
	restriction [1] 133:18		satisfied [1] 167:14	serious [3] 70:9; 132:9; 175:13
	restroom [1] 58:6		Saturday [6] 91:14; 144:6, 8, 24; 148:22; 149:1	seriously [2] 138:13; 163:11
	result [1] 78:19			serve [2] 120:15; 122:1
	resume [1] 113:15			served [5] 4:13; 41:19; 66:18; 68:5; 71:19
	reveal [2] 74:18; 128:21			Service [11] 86:23; 87:6, 12, 24; 89:14, 21;

-- S --

90:6; 91:15, 20, 21; 165:20	signs [1] 126:21	109:4; 123:9; 130:12; 132:6; 133:24; 137:20; 22, 24; 138:10; 143:21; 144:2; 158:23; 159:10; 172:19	standing [2] 91:23; 158:17	153:12
session [1] 3:3	silence [2] 125:4	132:6; 133:24; 137:20; 22, 24; 138:10; 143:21; 144:2; 158:23; 159:10; 172:19	STARR [3] 146:22; 165:8; 167:21	street [1] 89:21
settle [1] 27:22	simple [3] 125:7; 136:12; 149:23	132:6; 133:24; 137:20; 22, 24; 138:10; 143:21; 144:2; 158:23; 159:10; 172:19	Starr [5] 107:15; 147:6; 166:3, 13; 167:3	stricken [2] 13:12; 98:10
setup [1] 79:5	single [1] 36:11	132:6; 133:24; 137:20; 22, 24; 138:10; 143:21; 144:2; 158:23; 159:10; 172:19	Starr's [1] 108:3	strict [2] 26:17; 174:19
seven [2] 70:7; 101:18	Sir [4] 40:1; 48:18; 117:8; 150:23	132:6; 133:24; 137:20; 22, 24; 138:10; 143:21; 144:2; 158:23; 159:10; 172:19	start [1] 31:2	strike [1] 13:18
severed [1] 136:5	sir [132] 3:18; 4:1, 9, 25; 5:7, 12, 21; 6:6, 20; 7:8; 14, 20; 8:17, 18; 12:2, 9; 14:2; 16:15; 19:2, 9; 20:6; 23:22; 30:14; 33:11, 14; 34:18; 35:18; 36:22; 39:15; 40:13, 15; 41:3; 45:12; 47:9; 49:24; 51:21; 53:21; 54:22; 61:22; 62:17; 64:3, 23; 66:15; 25; 68:7; 69:21; 71:6; 74:3, 13; 76:1, 9; 77:21; 78:2; 79:8, 10; 80:7, 19; 81:4, 23; 82:6; 83:14; 85:10, 16; 87:21; 88:10; 12; 89:12; 91:1, 19; 92:3; 95:3, 22; 96:1, 7, 9; 97:14; 100:10; 102:3; 105:11; 106:5; 107:13; 109:6; 111:21; 112:20; 114:23; 115:1, 3; 116:10; 125:3; 127:3; 128:23; 129:8; 130:19; 133:11; 136:22; 139:11, 15; 141:19; 143:23; 144:4, 6; 10; 147:5; 149:4; 151:15; 152:14; 153:4, 8; 154:21; 155:7, 9; 156:7; 157:20; 25; 158:3; 159:5; 160:1; 4, 20, 24; 161:4, 5, 21; 163:8; 168:21, 23; 169:3; 170:1; 172:9; 173:17; 174:16, 19	severed [1] 136:5	start [1] 31:2	struggle [1] 68:12
sex [36] 20:18; 25:5; 26:21; 58:20; 59:2; 60:13; 93:14; 100:11; 101:4, 5; 10, 20, 21; 102:8, 10, 13; 104:7, 8, 25; 105:9; 106:5; 107:6; 108:14, 21; 111:2, 7, 8, 11; 121:10; 123:6, 9; 150:16; 151:7; 11; 152:5; 168:1	sexual [90] 8:14, 19; 10:3, 10, 22; 12:18, 22; 14:17; 15:11; 16:8, 24; 17:7, 13, 20; 18:8, 10, 15; 21:21; 22:13, 17, 23; 23:14, 15, 21, 25; 24:2; 5, 10, 14, 18; 26:9, 20; 28:5; 29:18; 37:16; 39:18; 22; 49:4; 60:9, 21; 61:19; 64:4, 7, 15; 66:2; 74:9; 78:12, 25; 93:5; 94:22; 95:9, 23; 96:4, 8, 19; 97:2; 100:3; 103:13; 105:1, 22; 106:1, 9; 108:4; 110:10; 13, 24; 120:23; 121:1, 9; 123:4, 16, 23; 139:3; 143:20; 147:9; 150:10; 20; 151:8, 19; 152:13; 162:11; 163:6, 10; 168:6	sexual [90] 8:14, 19; 10:3, 10, 22; 12:18, 22; 14:17; 15:11; 16:8, 24; 17:7, 13, 20; 18:8, 10, 15; 21:21; 22:13, 17, 23; 23:14, 15, 21, 25; 24:2; 5, 10, 14, 18; 26:9, 20; 28:5; 29:18; 37:16; 39:18; 22; 49:4; 60:9, 21; 61:19; 64:4, 7, 15; 66:2; 74:9; 78:12, 25; 93:5; 94:22; 95:9, 23; 96:4, 8, 19; 97:2; 100:3; 103:13; 105:1, 22; 106:1, 9; 108:4; 110:10; 13, 24; 120:23; 121:1, 9; 123:4, 16, 23; 139:3; 143:20; 147:9; 150:10; 20; 151:8, 19; 152:13; 162:11; 163:6, 10; 168:6	started [10] 19:11, 19; 26:3, 11; 30:4; 79:14; 108:9; 121:12; 136:25; 137:1	struggle [1] 68:12
Sexual [1] 97:11	sexual [90] 8:14, 19; 10:3, 10, 22; 12:18, 22; 14:17; 15:11; 16:8, 24; 17:7, 13, 20; 18:8, 10, 15; 21:21; 22:13, 17, 23; 23:14, 15, 21, 25; 24:2; 5, 10, 14, 18; 26:9, 20; 28:5; 29:18; 37:16; 39:18; 22; 49:4; 60:9, 21; 61:19; 64:4, 7, 15; 66:2; 74:9; 78:12, 25; 93:5; 94:22; 95:9, 23; 96:4, 8, 19; 97:2; 100:3; 103:13; 105:1, 22; 106:1, 9; 108:4; 110:10; 13, 24; 120:23; 121:1, 9; 123:4, 16, 23; 139:3; 143:20; 147:9; 150:10; 20; 151:8, 19; 152:13; 162:11; 163:6, 10; 168:6	sexual [90] 8:14, 19; 10:3, 10, 22; 12:18, 22; 14:17; 15:11; 16:8, 24; 17:7, 13, 20; 18:8, 10, 15; 21:21; 22:13, 17, 23; 23:14, 15, 21, 25; 24:2; 5, 10, 14, 18; 26:9, 20; 28:5; 29:18; 37:16; 39:18; 22; 49:4; 60:9, 21; 61:19; 64:4, 7, 15; 66:2; 74:9; 78:12, 25; 93:5; 94:22; 95:9, 23; 96:4, 8, 19; 97:2; 100:3; 103:13; 105:1, 22; 106:1, 9; 108:4; 110:10; 13, 24; 120:23; 121:1, 9; 123:4, 16, 23; 139:3; 143:20; 147:9; 150:10; 20; 151:8, 19; 152:13; 162:11; 163:6, 10; 168:6	starting [1] 34:1	struggling [2] 69:22; 116:14
sexually [2] 97:1; 111:10	sexually [2] 97:1; 111:10	sexually [2] 97:1; 111:10	starts [2] 14:19; 74:18	study [4] 56:17; 101:2; 133:8, 9
shape [11] 12:18; 20:19; 25:5; 58:21; 59:3; 60:13; 101:5, 21; 102:8; 104:7; 105:9	shape [11] 12:18; 20:19; 25:5; 58:21; 59:3; 60:13; 101:5, 21; 102:8; 104:7; 105:9	shape [11] 12:18; 20:19; 25:5; 58:21; 59:3; 60:13; 101:5, 21; 102:8; 104:7; 105:9	state [5] 3:17; 21:3; 26:23; 28:19	stuff [3] 108:23; 140:3; 153:1
share [1] 65:16	share [1] 65:16	share [1] 65:16	stated [2] 6:17; 120:22	subject [5] 4:3; 27:17; 58:14; 143:8; 162:7
shared [1] 121:22	shared [1] 121:22	shared [1] 121:22	statement [58] 9:16, 23; 11:1, 22; 12:11, 15, 19; 20; 20:24, 25; 22:2, 8; 24:4; 25:11, 14; 30:12; 38:23; 58:16, 22, 25; 59:2, 4, 8, 25; 60:18; 61:20; 71:23; 80:15; 88:14; 102:5, 21; 103:2; 109:25; 110:1, 11, 13, 17; 21, 22; 111:1, 5, 6, 13; 114:20; 119:23; 121:13; 132:2; 134:4; 138:24; 139:7, 10, 15, 22; 142:5; 146:1; 168:7	subjects [1] 131:18
shattered [1] 162:24	shattered [1] 162:24	shattered [1] 162:24	statements [7] 57:3; 59:11; 137:13; 139:24; 141:14; 142:2; 153:24	suborn [1] 109:4
she'd [3] 44:13; 120:19; 164:1	she'd [3] 44:13; 120:19; 164:1	she'd [3] 44:13; 120:19; 164:1	States [6] 4:24; 60:11; 12; 127:13; 130:16; 148:9	subornation [3] 10:24; 94:8; 108:22
She's [2] 124:20, 21	She's [2] 124:20, 21	She's [2] 124:20, 21	stay [7] 12:20, 25; 126:7; 135:14; 177:6; 160:8; 164:18	subpoena [34] 33:16; 36:19, 24; 37:6; 39:18; 40:11; 41:20; 42:5, 9, 14; 43:15; 44:10; 45:7, 10; 19, 20, 24; 47:3; 62:24; 63:12, 15; 65:9; 66:18; 67:10; 68:5; 71:20; 72:7; 73:22; 74:13; 75:9, 18; 76:4; 100:21; 115:8
she's [5] 43:14; 88:22; 122:20; 124:23; 161:6	she's [5] 43:14; 88:22; 122:20; 124:23; 161:6	she's [5] 43:14; 88:22; 122:20; 124:23; 161:6	stayed [4] 32:11; 138:11; 160:5, 7	subpoenaed [16] 39:8; 14; 40:17, 25; 41:13; 42:10, 23; 43:14; 63:9; 66:13, 23; 68:17; 115:20; 116:19; 123:10; 124:1
shocked [1] 72:17	shocked [1] 72:17	shocked [1] 72:17	staying [1] 110:11	subpoenas [1] 154:19
shot [1] 82:1	shot [1] 82:1	shot [1] 82:1	Steele [1] 164:8	subsequent [2] 53:10; 77:3
show [2] 63:5, 7	show [2] 63:5, 7	show [2] 63:5, 7	stewards [2] 134:14; 157:6	subsequently [1] 27:3
shutdown [2] 31:19, 21	shutdown [2] 31:19, 21	shutdown [2] 31:19, 21	stick [4] 51:13; 102:24; 125:20; 176:17	substance [1] 146:23
sic [6] 27:5; 41:21; 66:14; 73:3; 77:8; 153:20	sic [6] 27:5; 41:21; 66:14; 73:3; 77:8; 153:20	sic [6] 27:5; 41:21; 66:14; 73:3; 77:8; 153:20	sticking [1] 97:20	sued [1] 123:3
sick [1] 55:7	sick [1] 55:7	sick [1] 55:7	stipulate [1] 87:13	sufficient [1] 77:8
Sid [1] 108:1	Sid [1] 108:1	Sid [1] 108:1	stop [2] 5:16; 48:21	suggest [2] 131:5; 140:1
sides [1] 121:24	sides [1] 121:24	sides [1] 121:24	stopped [2] 124:17; 136:24	suggested [5] 18:20; 75:2; 79:21; 119:6; 123:23
sign [1] 4:15	sign [1] 4:15	sign [1] 4:15	stored [2] 171:2, 3	suggestion [1] 109:3
signal [5] 140:8; 168:20; 25; 169:4, 5	signal [5] 140:8; 168:20; 25; 169:4, 5	signal [5] 140:8; 168:20; 25; 169:4, 5	stories [1] 99:20	suicide [1] 164:10
signed [6] 49:10; 74:5; 6, 8; 126:16; 127:3	signed [6] 49:10; 74:5; 6, 8; 126:16; 127:3	signed [6] 49:10; 74:5; 6, 8; 126:16; 127:3	story [21] 100:24, 25; 101:3; 104:6; 105:12; 106:12; 108:3, 18, 21, 22; 119:12; 142:9; 143:13; 151:22; 163:23; 164:4, 7, 8, 13; 171:25; 172:3	suit [2] 79:14, 15
			straightened [1] 145:17	summarize [1] 32:20
			strange [1] 19:3	summer [2] 84:14; 173:7
			strategy [7] 26:8, 14; 27:16, 19; 37:13; 40:2;	Sunday [7] 32:10; 53:16; 131:21; 132:11; 144:7, 24; 149:5
				sunglasses [1] 36:4
				supervisor [1] 113:16
				supported [2] 166:25; 167:18
				suppose [2] 18:23; 97:24
				Supreme [1] 122:1
				Surely [1] 102:1

surfaced [1] 172:23	69:20; 71:21; 79:4; 82:4;	there'd [1] 122:13	transfer [2] 128:12;	unaware [5] 38:10;
surprised [2] 38:12;	87:14; 89:15; 101:3;	There's [5] 30:24;	129:16	103:10, 25; 135:21, 23
172:6	104:8; 106:3; 108:8;	93:22; 97:3; 139:12;	transferred [2] 112:24;	uncertain [1] 171:7
surrounding [1] 119:3	116:6, 8; 117:14; 121:21;	148:2	128:18	uncomfortable [2] 9:10;
Susan [2] 58:23; 150:24	122:5, 19, 20; 129:8;	there's [8] 30:25; 33:3;	transmission [1]	99:16
sustained [1] 148:5	149:2; 158:11; 163:4	41:18; 69:20; 77:6; 93:9;	176:21	uncovering [1] 26:9
sweeping [1] 122:22	tells [1] 60:12	107:5	traumatized [1] 37:11	undercut [1] 172:6
switch [1] 100:22	tend [1] 5:24	thereafter [1] 177:18	traumatizing [1] 81:8	undermined [2] 113:1;
swore [3] 7:25; 23:3;	tense [7] 20:23; 25:11;	they'd [3] 40:5; 69:11;	treated [2] 26:18; 29:3	164:4
66:11	60:22; 61:25; 62:2, 3, 7	152:15	treating [1] 80:23	understand [41] 4:1,
sworn [8] 3:11; 6:11;	tense-based [1] 60:24	thinking [7] 25:9; 30:2;	trick [5] 22:20; 68:23;	25; 5:7, 11, 21, 22; 6:1, 6,
7:4; 61:8; 70:2; 75:6;	term [12] 10:4, 22;	59:19; 61:14; 88:19;	69:3; 72:1; 80:4	8, 11, 19; 7:6; 14:24;
80:16; 177:17	14:17; 23:21; 24:2, 9, 17;	90:16; 150:4	tricky [1] 69:17	15:3, 9, 13; 16:7, 18, 22;
sympathetic [3] 82:13,	64:19; 96:19; 150:10, 20;	third [3] 60:17; 69:6, 21	triggered [1] 91:21	18:6; 43:19; 57:1; 59:18;
14; 108:20	171:5	thirly [1] 124:14	trip [2] 68:22; 68:16	61:17; 71:5, 17, 22;
system [1] 6:23	terminate [1] 89:10	thirty [1] 174:2	Tripp [9] 29:5; 52:23;	84:11; 94:4; 97:6; 98:24;
-- T --				
table [1] 80:20	terminated [3] 54:2;	Thomas [3] 121:19, 25;	53:4; 68:21; 69:11; 70:4;	25; 100:1; 103:23; 109:7;
talk [34] 5:13; 23:4, 6;	89:6; 124:9	122:15	71:4; 76:16; 80:3	116:2; 119:21; 142:18,
25:16; 37:6; 39:16; 41:21;	terms [10] 12:20; 18:25;	Thomasson [2] 105:23;	Tripp's [1] 78:21	24; 170:2
60:5, 6; 68:2; 72:10, 25;	48:19; 81:17; 106:7, 18;	108:2	trouble [5] 44:3; 107:23;	understandably [1]
77:3; 82:8; 83:7, 23;	111:4; 151:4; 171:7;	three [14] 32:14; 65:1;	109:2; 122:22; 151:21	142:12
85:21; 100:22; 107:23,	176:17	66:20; 68:15, 18; 71:24;	troubled [3] 46:10;	understanding [18]
24; 112:5; 116:4; 124:19;	terrible [3] 140:20;	76:3, 8; 98:15; 105:13;	162:22; 163:8	4:14, 17; 10:21; 15:4, 15,
125:1; 126:15, 21, 22, 23;	142:14; 169:4	112:8; 141:11, 24	true [30] 22:5; 23:2, 11;	18, 21; 17:19, 22, 23, 24;
128:6; 136:11; 147:6;	terribly [1] 171:24	throw [1] 27:3	24:13; 26:6; 27:10; 36:12;	24:9; 25:1; 96:5; 150:10;
149:9, 15; 169:5	test [1] 138:19	throat [1] 161:14	52:14; 57:4; 59:8; 60:23;	152:12, 14; 170:9
talked [48] 33:20; 42:8;	testified [30] 3:12;	throw [1] 35:20	61:21; 62:8; 63:2; 64:8;	understood [22] 10:4,
43:3, 10; 47:14; 51:11;	40:15; 42:19; 47:5; 51:24;	tie [14] 155:24; 156:2, 3,	69:1; 76:15; 107:3, 5, 7,	22; 16:9, 12, 14; 21:11;
56:19; 70:14, 19; 72:13;	53:6; 54:24; 57:2, 21;	9, 23; 157:1, 12; 168:13;	10; 108:25; 115:15;	37:8, 17; 48:20; 74:9;
73:1, 16; 74:25; 75:3, 13;	59:9; 61:5; 63:18; 67:3;	169:1, 3, 7, 8; 173:2	134:22; 157:15; 159:8;	80:16; 93:15, 17; 95:10;
76:7, 16, 17, 24; 78:5, 6;	71:24; 93:7; 95:23; 106:9;	ties [10] 45:1; 156:7, 8,	163:2; 175:25; 177:19	96:19; 97:6, 19, 20;
86:1; 105:14; 108:19;	114:18; 122:12; 132:21;	17, 19, 20, 22; 157:7, 9;	trust [1] 63:23	150:11, 19; 153:6; 176:23
111:21; 112:2; 113:23;	134:25; 135:16; 139:17;	168:22	truth [42] 6:12, 13; 7:1,	unfavorable [1] 123:22
114:14; 116:20; 118:12;	21; 141:21, 24; 149:24;	timeframe [2] 119:7;	5, 7, 11, 12; 8:1, 15, 20;	unfortunate [3] 103:7;
121:8; 127:3, 5, 6, 8, 11,	150:19; 155:5; 166:9	125:20	23:16; 28:1; 48:18; 57:12;	124:17, 22
25; 129:14, 21; 130:17;	testify [22] 22:10; 36:25;	times [37] 13:24; 30:15,	62:1; 71:6; 75:6, 7; 79:9;	unfortunately [1]
22; 131:12, 18; 135:14;	37:5, 19, 23; 38:2; 39:17;	22; 31:6, 7, 8, 11; 32:9,	80:16, 17, 22; 82:4, 19;	121:23
138:21; 142:7	19; 41:22; 42:15; 57:5, 8;	14, 21, 22, 24; 34:9;	94:5, 6; 104:9; 120:8, 10;	Uninformed [4] 87:12;
talking [35] 14:23; 15:2;	59:9; 65:6; 67:4; 73:11;	38:22, 24; 53:24; 54:5,	121:21; 122:5, 20, 21;	89:3, 14; 91:25
22:11, 18, 20, 22; 33:15,	104:11; 120:13; 122:4;	13; 55:14, 20; 56:16;	128:10; 133:3; 140:23;	uniformed [1] 89:19
18; 54:3; 58:14; 75:7;	137:17; 142:14; 168:11	71:25; 72:23; 91:10;	143:17; 163:4	uninvolved [2] 28:4, 5
82:11; 84:11; 89:1; 90:18;	testifying [6] 37:2, 8;	127:6; 129:13; 132:17;	Truthful [1] 22:4	United [6] 4:24; 60:11,
92:2; 98:16; 108:19, 22;	73:15; 77:9; 120:20;	133:8; 134:11, 16; 135:3;	truthful [18] 5:24; 8:1,	12; 127:13; 130:16; 148:9
111:9; 112:19; 117:22;	121:19	141:5; 142:7; 156:25;	16; 23:23; 24:12; 29:15;	unlawful [1] 29:20
126:14; 128:16; 132:19;	testimony [53] 3:5, 25;	165:9	43:12; 57:13; 62:19; 80:2,	unlawfully [1] 78:15
133:12, 22; 136:23;	4:19; 6:8; 7:3; 9:19;	Titanic [1] 49:20	11; 81:5; 112:16; 117:25;	unlike [1] 67:14
148:20; 153:15, 17;	19:19, 22, 23; 25:9; 30:1,	today's [1] 7:3	120:12; 142:5; 143:11;	unprecedented [2]
161:11; 162:3; 169:22;	2; 32:20; 33:19, 20; 43:2;	toll [1] 160:16	147:8	148:10; 150:3
173:18	44:16; 46:11, 15, 16, 19;	tone [1] 76:9	truthfully [7] 7:19, 22;	unrelenting [1] 79:12
tangible [2] 172:25	59:13, 25; 61:12, 15;	topic [1] 100:22	8:23; 28:20; 93:7; 152:9;	untruthful [3] 24:4;
tapes [2] 69:2; 121:16	62:12; 66:15, 21, 24;	tormenting [1] 81:8	168:11	57:15; 142:18
taping [2] 176:21, 22	78:20; 91:5, 9; 94:15;	total [1] 5:20	turning [2] 46:12;	unusual [10] 19:13, 25;
team [1] 46:6	96:18; 100:1; 107:8;	totally [2] 45:23; 172:5	169:24	20:2; 24:1; 59:10; 99:9;
technical [1] 4:18	116:13; 118:11, 16;	touch [2] 62:14; 139:19	twice [3] 32:9, 18;	147:24; 148:4; 157:11, 13
telephone [13] 10:8;	124:4; 142:24; 143:15;	touched [8] 94:19, 25;	160:23	upbringing [1] 124:23
43:24; 76:8, 25; 85:16,	147:10, 18; 148:1;	96:2; 109:11; 110:7, 19;	two-minute [2] 145:5;	upset [18] 39:8, 13, 15,
19; 126:22; 129:14;	166:10, 20; 170:2;	139:18	165:2	17; 42:9; 54:1; 55:15;
130:23; 159:4, 22, 25;	177:16, 17, 19	touching [7] 95:19, 20;	typewriting [1] 177:18	65:6, 10, 25; 66:24;
160:16	testing [1] 137:21	96:21, 22; 100:2, 4; 139:3	typical [1] 148:1	85:25; 86:9, 16; 90:13;
television [1] 158:16	Thank [9] 3:6; 4:21;	tough [2] 82:13; 92:24	-- U --	
elling [27] 23:11; 36:6;	11:2; 12:14; 77:15; 92:7;	towards [1] 22:1	ultimately [1] 175:22	urge [1] 118:18
50:5, 10; 62:1; 65:21;	148:15; 167:21; 177:10	town [3] 34:6, 13;	unanswered [1] 176:6	urged [1] 109:3
	thank [2] 122:15;	160:14	unauthorized [1] 3:3	utterly [1] 59:4
	125:15	transcript [4] 18:24;		
	thanks [1] 78:20	19:18; 30:4; 61:11		

-- V --

vacation [1] 173:6
 vague [2] 158:9, 161:16
 validate [1] 40:5
 Vancouver [1] 35:8
 Vernon [30] 42:25; 43:3;
 63:20; 66:21; 67:24;
 70:17, 18, 19; 71:9, 11,
 21; 72:11, 13, 25; 73:1,
 17, 22; 74:14, 22; 75:7,
 21; 76:2, 23; 77:2, 21;
 108:1; 122:25; 123:7, 15;
 125:4
 victory [1] 167:19
 videotape [4] 148:2, 10;
 177:5, 7
 videotaping [1] 177:4
 view [7] 9:21; 73:9;
 78:8; 94:20, 21; 95:19;
 100:11
 Vineyard [1] 34:22
 violate [1] 172:20
 violated [2] 139:2;
 168:10
 violating [2] 81:14;
 170:7
 violation [1] 39:25
 Virginia [2] 157:22;
 160:6
 vis-a-vis [1] 46:5
 visit [5] 31:1; 64:14;
 85:23, 24; 86:2
 visited [3] 62:22; 63:15;
 85:9
 visitor [1] 86:6
 visits [1] 89:11
 voice [1] 76:9
 volume [2] 72:20; 164:3
 voluntarily [2] 4:5;
 164:7
 volunteer [1] 29:1
 vote [1] 146:8

-- W --

Wait [1] 144:18
 waiting [2] 25:18; 62:10
 walk [1] 81:13
 wall [1] 55:17
 Walt [1] 52:12
 wanted [40] 26:16; 27:7;
 29:19; 39:24, 25; 55:15,
 19, 20, 25; 69:14; 79:19;
 85:13; 86:13, 14; 88:16,
 17; 90:1; 106:21; 112:21;
 113:10, 24; 114:9, 10;
 124:10; 125:6; 126:6, 7;
 128:12; 145:23; 146:7, 8;
 147:6; 152:17, 19;
 154:17; 176:13, 14
 Washington [3] 100:25;
 101:3; 141:12
 watch [2] 53:19; 164:22

WAVE [2] 63:5; 133:24
 ways [2] 122:6; 124:3
 we'd [1] 84:16
 We'll [2] 14:5; 175:1
 we'll [3] 100:17; 126:11;
 145:14
 We're [3] 84:11; 164:21;
 175:2
 we're [5] 22:11; 98:16;
 121:12; 152:25; 165:5
 We've [2] 58:5; 62:17
 we've [3] 21:9; 66:16;
 166:8
 weakened [1] 166:7
 wear [3] 156:2, 24;
 157:2
 wearing [2] 168:20;
 169:1
 Webber [2] 58:23;
 150:24
 week [4] 32:2; 72:24;
 127:4; 144:22
 weeks [7] 51:25; 66:21;
 68:15, 19; 73:25; 76:3, 8
 well-motivated [1] 46:4
 weren't [7] 40:10; 43:18;
 49:2; 82:4; 87:6; 134:6;
 139:25
 West [1] 113:22
 what's [3] 45:25; 76:21;
 146:25
 whatsoever [1] 60:14
 WHCA [1] 4:16
 whenever [1] 107:20
 WHEREUPON [1] 3:8
 Whereupon [7] 11:12;
 58:9; 92:8; 125:11;
 148:17; 165:6; 177:11
 whipping [1] 151:20
 White [61] 30:24; 31:9;
 13, 14, 22, 23; 32:22, 23;
 33:12; 34:12; 39:1; 42:11;
 20; 53:16; 54:9; 55:3;
 62:23; 63:16; 64:14;
 66:22; 68:16; 83:9;
 85:23; 89:11; 113:21, 22;
 114:3, 5, 10; 124:4;
 128:18; 129:16, 23;
 130:2, 9; 133:24, 25;
 143:7, 21; 149:8; 157:5;
 163:21; 164:15; 166:14,
 16, 17; 167:5; 170:4, 12,
 15, 19, 22; 171:1, 9, 12;
 172:10; 173:18; 174:5, 9,
 17, 23
 Whitman [1] 52:12
 whoever [1] 98:2
 wide [1] 153:23
 widest [1] 153:1
 Wilder [4] 158:5, 8;
 161:25; 162:1
 Willey [15] 60:6; 67:18;
 157:18; 158:21, 25;
 161:6; 162:6, 11; 164:9;
 169:24; 171:24; 172:23;

174:15; 175:20
 Willey's [4] 160:15;
 162:24; 170:21
 WILLIAM [1] 3:9
 William [1] 3:19
 Williamsburg [4] 160:8,
 10, 11, 17
 willing [2] 92:21; 126:7
 willingness [1] 94:3
 win [1] 27:20
 Wing [1] 113:22
 wire [1] 144:11
 WIRTH [2] 14:7; 169:15
 WISENBERG [25] 3:6,
 14; 4:14, 22; 8:24; 58:12;
 61:4, 16; 77:13; 84:19;
 82:6, 11; 97:18; 99:2, 3;
 100:8; 104:4; 105:4, 6, 8;
 125:9; 167:22; 169:13,
 19; 177:3
 Wisenberg [17] 3:2, 20;
 4:11; 59:20; 60:16; 67:1;
 68:20; 71:24; 85:24;
 98:22; 99:7; 102:11;
 103:11; 104:2; 149:12;
 154:15; 177:7
 wish [5] 81:6; 83:25;
 176:11, 12; 177:1
 wishes [2] 12:13; 112:7
 withdrawn [1] 166:23
 withdrew [1] 166:17
 WITNESS [26] 11:9;
 12:2, 4; 14:11; 41:12;
 61:7; 77:11; 84:11; 97:14;
 16; 125:23; 127:2;
 144:19; 145:12, 16, 20;
 146:25; 165:1, 4; 171:18;
 173:24; 174:1, 3; 175:4;
 176:11; 177:8
 Witness [1] 39:10
 witness [45] 5:14; 6:25;
 7:1; 8:21, 22; 12:1, 3, 10,
 11; 30:6; 41:2, 6, 13;
 57:11; 61:4, 8; 62:11;
 70:5; 84:20, 22; 98:25;
 100:6; 105:2, 6; 107:22;
 116:8, 9, 22; 117:2, 16;
 119:6, 22; 120:4, 6, 16,
 17; 124:1; 133:4; 145:9;
 171:14; 175:1; 177:16,
 17, 20
 witnesses [7] 5:5, 15;
 10:25; 106:23, 24; 107:2,
 16
 WJC-1 [2] 11:6, 7
 WJC-2 [2] 13:3, 4
 WJC-3 [2] 14:8, 9
 WJC-4 [3] 21:16, 17;
 24:25
 WJC-5 [2] 169:15, 16
 WJC-6 [1] 169:17
 woman [4] 47:19; 123:4;
 124:21
 women [3] 39:20; 49:15;
 159:20

won't [12] 5:19; 21:6;
 109:17, 24; 110:25;
 112:15; 114:12; 156:14;
 157:2; 160:21; 161:22;
 174:25
 word [3] 16:22; 59:5;
 65:20
 words [10] 8:15; 15:9;
 13; 23:8; 30:3; 60:18;
 80:22; 91:11; 97:23;
 109:4
 wore [6] 155:6, 9;
 156:3, 9; 166:14; 169:9
 work [20] 31:22, 23, 24,
 25; 45:24; 69:7, 10; 77:6;
 78:21; 79:22; 81:3, 6, 17;
 86:12; 114:5; 129:23;
 153:8; 157:3, 5; 167:9
 worked [9] 4:6; 30:24;
 32:3, 19; 76:13; 82:15,
 16; 113:15; 144:16
 working [4] 32:6; 89:15;
 130:7; 138:10
 world [5] 70:11; 76:11;
 153:16, 18, 23
 worried [8] 45:21;
 47:23; 62:11; 114:4;
 116:2, 3; 129:19; 166:12
 worry [3] 140:20, 22;
 165:25
 Wouldn't [2] 118:23;
 152:23
 wouldn't [19] 4:20;
 38:6; 50:2; 73:12; 102:10;
 103:13; 107:23; 113:6;
 116:25; 120:13, 17;
 124:5; 130:13, 14;
 131:16; 136:3; 157:13;
 163:10
 wrecking [1] 28:12
 Wright [10] 13:10;
 19:13; 25:1, 4, 22; 27:3;
 28:13; 58:23; 93:5;
 150:24
 write [4] 23:5; 50:6;
 80:25; 132:9
 written [3] 50:21;
 130:25; 164:1
 wrong [16] 10:2; 38:20;
 49:18; 53:1; 75:13; 93:3;
 98:18; 99:4; 105:21;
 115:14; 118:22; 119:18;
 123:24; 124:17; 132:8;
 153:10
 wrongdoing [1] 140:11
 wrote [4] 50:11, 20;
 98:2; 130:20

-- Y --

Yeah [3] 144:1, 7;
 160:10
 yeah [1] 130:25
 year [12] 44:21; 47:11;
 53:16; 55:8; 126:13;

155:6; 156:16, 25; 157:7;
 9; 158:6
 years [6] 35:13; 53:18;
 62:17; 72:19; 175:7, 8
 York [10] 33:25; 35:11,
 14, 23; 75:16, 24; 77:3;
 112:21; 114:9
 You'd [1] 25:16
 you'd [2] 63:16; 64:3
 You'll [3] 23:19; 106:7;
 140:24
 you'll [5] 45:4; 61:7;
 106:6; 109:23; 110:2
 You've [10] 40:11; 71:5;
 82:15, 16, 17; 108:10;
 134:23; 158:21; 174:2
 you've [15] 25:2; 44:8;
 67:6; 91:7; 98:23; 100:23;
 108:7; 113:15; 135:16;
 150:9, 14, 19; 158:16;
 160:6; 163:2
 young [1] 124:21
 yours [2] 62:16; 73:4
 yourself [4] 73:21; 86:4;
 147:25; 176:7

-- Z --

zeroing [1] 28:3

Tab 17

STATEMENT

When I was alone with Ms. Lewinsky on certain occasions in early 1996 and once in early 1997, I engaged in conduct that was wrong. These encounters did not consist of sexual intercourse; they did not constitute "sexual relations" as I understood that term to be defined at my January 17, 1998, deposition; but they did involve inappropriate intimate contact. These inappropriate encounters ended, at my insistence, in early 1997. I also had occasional telephone conversations with Ms. Lewinsky that included inappropriate sexual banter.

I regret that what began as a friendship came to include this conduct. I take full responsibility for my actions.

While I will provide the grand jury whatever other information I can, because of privacy considerations affecting my family, myself, and others, and in an effort to preserve the dignity of the Office I hold, this is all I will say about the specifics of these particular matters. I will try to answer to the best of my ability other questions, including questions about my relationship with Ms. Lewinsky, questions about my understanding of the term "sexual relations" as I understood that term to be defined at my January 17, 1998, deposition, and questions concerning alleged subornation of perjury, obstruction of justice, and intimidation of witnesses.

Tab 18

Paula Jones v. William Jefferson Clinton and Danny Ferguson
No. LR-C-94-290 (E.D. Ark.)

DEPOSITION OF WILLIAM JEFFERSON CLINTON

Definition of Sexual Relations

For the purposes of this deposition, a person engages in "sexual relations" when the person knowingly engages in or causes -

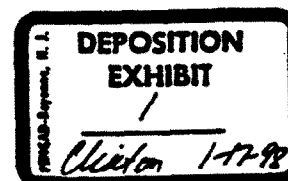
(1) contact with the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to arouse or gratify the sexual desire of any person;

(2) contact between any part of the person's body or an object and the genitals or anus of another person; or

(3) contact between the genitals or anus of the person and any part of another person's body.

"Contact" means intentional touching, either directly or through clothing.

849-DC-00000586



Tab 19

1/17/98 Deposition of
President William Jefferson Clinton
in the case of *Jones v. Clinton*

See Tab 1

Tab 20



AFFIDAVIT OF JANE DOE # 6

1. My name is Jane Doe #6. I am 24 years old and I currently reside at 700 New Hampshire Avenue, N.W., Washington, D.C. 20037.

2. On December 19, 1997, I was served with a subpoena from the plaintiff to give a deposition and to produce documents in the lawsuit filed by Paula Corbin Jones against President William Jefferson Clinton and Danny Ferguson.

3. I can not fathom any reason that the plaintiff would seek information from me for her case.

4. I have never met Ms. Jones, nor do I have any information regarding the events she alleges occurred at the Excelsior Hotel on May 8, 1991 or any other information concerning any of the allegations in her case.

5. I worked at the White House in the summer of 1995 as a White House intern. Beginning in December, 1995, I worked in the Office of Legislative Affairs as a staff assistant for correspondence. In April, 1996, I accepted a job as assistant to the Assistant Secretary for Public Affairs at the U.S. Department of Defense. I maintained that job until December 26, 1997. I am currently unemployed but seeking a new job.

6. In the course of my employment at the White House I met President Clinton several times. I also saw the President at a number of social functions held at the White House. When I worked as an intern, he appeared at occasional functions attended by me and several other interns. The correspondence I drafted while I worked at the Office of Legislative Affairs was seen and edited by supervisors who either had the President's signature affixed by mechanism or, I believe, had the President sign the correspondence itself.

7. I have the utmost respect for the President who has always behaved appropriately in my presence.

8. I have never had a sexual relationship with the President, he did not propose that we have a sexual relationship, he did not offer me employment or other benefits in exchange for a sexual relationship, he did not deny me employment or other benefits for rejecting a sexual relationship. I do not know of any

other person who had a sexual relationship with the President, was offered employment or other benefits in exchange for a sexual relationship, or was denied employment or other benefits for rejecting a sexual relationship. The occasions that I saw the President after I left my employment at the White House in April, 1996, were official receptions, formal functions or events related to the U.S. Department of Defense, where I was working at the time. There were other people present on those occasions.

9. Since I do not possess any information that could possibly be relevant to the allegations made by Paula Jones or lead to admissible evidence in this case, I asked my attorney to provide this affidavit to plaintiff's counsel. Requiring my deposition in this matter would cause disruption to my life, especially since I am looking for employment, unwarranted attorney's fees and costs, and constitute an invasion of my right to privacy.

I declare under the penalty of perjury that the foregoing is true and correct.

Monica S. Lewinsky

MONICA S. LEWINSKY

849-DC-00000635

DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oath according to law, deposes and says that she has read the foregoing AFFIDAVIT OF JANE DOE # 6 by her subscribed, that the matters stated herein are true to the best of her information, knowledge and belief.

Monica S. Lewinsky
MONICA S. LEWINSKY

SUBSCRIBED AND SWORN to before me this 7th day of January, 1998.

Kathleen M. Grimes
NOTARY PUBLIC, D.C.
My Commission expires: August 31, 1998

849-DC-00000636

Tab 21



August 6, 1998

Tab 22



August 6, 1998

700